



**Executive**  
12<sup>th</sup> March 2007

**Report from the Director of  
Environment and Culture**

For Action

Wards Affected:  
ALL

**Local Development Framework Site Specific Allocations  
Preferred Options**

Forward Plan Ref: E&C-06/07-053.

**1.0 Summary**

1.1 This report presents a draft set of Site Specific Allocations that constitute an important document of the new Local Development Framework (LDF). The Council is required to consult with the local community on its 'Preferred Options' for the Site Specific Allocations. The preferred options for the Site Specific Allocations have been drawn up after a round of public consultation on 'Issues and Options' in Autumn/Winter 2005, and have been subject to Sustainability Appraisal.

**2.0 Recommendations**

2.1 Executive note the views and accept the changes recommended by Planning Committee 31/1/07 as set out in paragraphs 3.26 to 3.39 except for in relation to allocation number 42, Kingsbury Library and Community Centre (see paragraph 3.29); and

2.2 Executive agrees the Site Specific Allocations (preferred options) for six weeks public consultation; and

2.3 Executive delegates minor changes to the Director of Planning.

## **3.0 Detail**

### **The LDF Process Explained**

- 3.1 The Council is required to prepare a Local Development Framework (LDF) to replace the Unitary Development Plan. The LDF will be a portfolio of Development Plan Documents including a Core Strategy, Development Control Policies, Site Specific Allocations and Supplementary Planning Documents. A Statement of Community Involvement was adopted in June 2006.
- 3.2 The Core Strategy contains the Vision and Spatial Strategy including the identification of Growth Areas and was agreed for public consultation on preferred options on the 9th of October 2006. The Site Specific Allocations are in line with the concept of Growth Areas.
- 3.3 A set of issues and options stage Site Specific Allocations has already been subject to public consultation and the next stage is the preferred options, also subject to six weeks public consultation.
- 3.4 The timetable for producing the Development Plan Documents has been agreed by the Secretary of State and is contained in the Local Development Scheme (LDS) - a project plan for producing the LDF. The LDS has been amended, and it is possible that it will need to be again to reflect some slippage in the timetable.

### **Public consultation**

- 3.5 A major round of public consultation on the 'Issues and Options' for drawing up a new development plan for the Borough was carried out in September/October 2005. The consultation consisted of a questionnaire distributed via the Brent Magazine, the distribution of a set of Issues and Options papers with a response section (including the option of responding online) and two workshops held in different parts of the borough. One of the Issues and Options papers set out the options for the development of 32 sites. A summary of the outcome of this consultation was put to Planning Committee on in November 2005.
- 3.6 48 organisations or individuals responded to the Site Specific Allocations Issues and Options consultation. The views from this round of consultation, as well as any views that have been submitted to the Planning Service subsequently, have been taken into account in drawing up the Site Specific Allocations. (NB - the detailed responses from individuals or organisations to the Issues and Options papers have been compiled into a single document, which is available to anyone on request, and the individual responses are available to view online as well).

### **Sustainability Appraisal**

- 3.7 It is a statutory requirement that Sustainability Appraisal be undertaken as an integral part of drawing up the new or revised policies of the Plan. This Sustainability Appraisal, which incorporates a Strategic Environmental Assessment as required by European legislation, is being undertaken together

with consultants, Collingwood Environmental Planning, to enable an independent assessment to be made of the emerging policies.

- 3.8 The report has not identified any sites which it would recommend are not included or that should have a different preferred use as than identified. However, the report recommends that the document makes reference to additional requirements of development, such as flood risk assessment or improvements to public transport or open space provision. Officers will consider the recommendations and make changes to the document where appropriate. The consultants will continue to report on the Site Specific Allocations and produce subsequent detailed reports, for example at submission stage. The initial report is included at appendix 2.

### **Site Specific Allocations**

- 3.9 The Site Specific Allocations preferred options have been prepared following the Issues and Options stage of consultation in 2005. In addition, there has been an on going process of informal consultation internally and with the Council's partners that has led to the consideration, exclusion, inclusion or modification of individual allocations.

- 3.10 The document includes the preferred options for sites, as derived from the issues and options stage of consultation and justification as to why the site and the option have been identified. In addition, the sustainability appraisal report provides further analysis and justification.

- 3.11 The document also includes a section that includes allocations that have been considered at Issues and Options stage, but not included as a preferred option. The Site Specific Allocations (preferred options) document is included as Appendix 1.

### **Key issues and sites for consideration**

- 3.12 The document contains a number of allocations referring to specific uses or a mix of uses at particular locations. The allocations are made to respond to particular issues that face the borough, particularly in relation to population change.

- 3.13 In addition to taking account of local public opinion, the Site Specific Allocations are derived from the Core Strategy that reflects and incorporates national and regional planning policy. Development Plan Documents must be in conformity with the Mayor of London's 'London Plan'. The Mayor's strategy for London is to see London grow significantly over the next 10-20 years (by 700,000 people - equivalent to the size of Leeds).

### **Housing Growth**

- 3.14 The Mayor has published new housing targets for London and each borough and these are contained in his Alterations to the London Plan. The housing targets state that Brent must plan for the development of 10,146 new dwellings by 2016. This is addressed within the Core Strategy preferred options – directing new development to five identified growth areas of Wembley, Alperton, Church End, Kilburn and Colindale/Burned Oak Broadway.

### New School Sites

3.15 A number of allocations provide for new and expanded primary and secondary schools to meet existing and future demand. Consideration of suitable sites for schools includes among other issues, the location in relation to population change and public transport accessibility. The allocations identified for schools are:

- **No. 11: London Transport Sports Ground, Wembley:** For a new primary and secondary school, as agreed by Executive on January 5th 2007. The allocation makes it clear that the campus will be on the Bridge Road frontage with the dual use of the sports pitches to increase accessibility to the public.
- **No. 19: Dollis Hill Estate:** The expansion of the adjacent John Kelly School on to part of the estate.
- **No. 87: Kingsbury High School:** Planned consolidation and expansion of school onto single campus, allowing for improved sports facilities. A limited amount of residential development may be required to enable this.
- **No. 25: Oriental City:** The mixed-use, residential led development includes a new primary school. This allocation has been included to provide certainty since parties are yet to sign the Section 106 agreement.

### Community facilities

3.16 Population growth puts pressure on other services and facilities, while the Council can capture the value created from residential development to deliver new and/or improved services. Allocations for other community facilities to meet the needs of current and future demand include:

- **No. 7: Ex Unysis buildings and Bridge Park:** The site requires comprehensive redevelopment to deliver the best possible disposition of land uses. A new recreation centre will replace Bridge Park (at no cost to the Council) and act as a 30 metre barrier between residential development and the North Circular Road to mitigate the impact of noise pollution and poor air quality. The allocation seeks that some additional community facilities and business uses shall also be included. The planning service will bring forward a Supplementary Planning Document for this site.
- **No. 9: Vale Farm Leisure Centre:** The reconfiguration includes new facilities to be located within the running track. This is a long term proposal.
- **No. 83: Land adjoining St Johns Church, Wembley:** A new community facility is planned alongside residential development. Development will be smaller in scale than previously envisaged so as not to detract from the views and setting of the Listed building nor impact adversely on the frontage of the High Road.

#### Town Centres

3.17 A number of allocations relate to the reinvigoration of town centre sites through mixed use development, including new retail and residential development. These allocations contribute to the strategy of focusing residential development in 'growth areas', while introducing new commercial floorspace that is more attractive to higher value occupiers. Examples include:

- **No. 28: Wembley West End:** A Supplementary Planning Document has been adopted by Executive, seeking to introduce new retail floorspace, residential units and possibility of introducing community facilities at the Curtis Lane Car Park site. The Site Specific Allocation has been included to clearly promote the site for development.
- **No. 61: Queens Park Station Area:** A Supplementary Planning Document has been adopted by Executive, directing the nature and scale of development of the parcel south of the Station.

#### Industrial areas

3.18 Council officers are exploring means of regenerating industrial employment estates so that they continue to meet demand for a range of occupiers. The document identifies industrial sites where the Council is seeking comprehensive employment led development. These allocations also include a limited amount of residential development to enable the improvements to the industrial fabric. Such sites include:

- **No. 4: The former Guinness Brewery:** An opportunity for industrial/warehousing complex and a small amount of residential on the lorry park site to the north. There is an adopted SPD that also supports higher education and health related development. It is not proposed to re-designate the office development at First Central. Depending on the take up of the second block, it is the clear intention to pursue all means to deliver the station interchange with the third phase.
- **No. 32: The Northfields Industrial Estate:** An innovative proposal for a multi-storey industrial/warehousing complex that addresses local transportation and environmental problems that will undermine the estates viability in time, including inadequate access to the North Circular Road. A limited amount of enabling residential on the part of the site that is not suitable for industrial development owing to inadequate servicing due to its depth. Further residential development is proposed in the locality, including a zero energy or low carbon scheme on the adjacent site to the west.

3.19 The residential led mixed use regeneration where existing industry is poorly located and rationalisation will lead to a better disposition of land uses as well as helping to improve the character and environment of areas characterised by a conflict between industrial and suburban land uses. The value generated from residential development can subsidise the inclusion of new workspaces so that land and premises are not simply lost to new residential development.

- **No. 101: Shubette, Karma, Apex and Albion Houses:** This allocation requires a comprehensive approach to deliver the best disposition and relationship of land uses. The allocation promotes

opportunities for major mixed use development including office floorspace, managed affordable workspace, hotel and associated leisure facilities, food and drink and residential development.

- **No. 43: Abbey Manufacturing Estate, Alperton:** this allocation should result in a better relationship between the suburban residential fabric and employment floorspace while contributing to improving the overall character of Alperton. The concept of the allocation is to use residential development to subsidise the creation of modern workspace that can operate to modern standards and to remove bad neighbour uses.

#### Waste

- 3.20 The document identifies **Twynford Tip (no. 3)** as suitable for a waste facility owing to its proximity to the North Circular Road and the Grand Union Canal and the distance from residential development, and other more sensitive industrial operations.
- 3.21 Planning permission was granted in 1993 for the mixed use development including TV studios, hotel and leisure uses with retail development subsequently added to permission. The amount of further retail development that may be required to produce a viable mixed use scheme is contrary to government guidance (Planning Policy Statement 6) and would also detract from the retail provision of Wembley.
- 3.22 The Council is required to identify land for waste and recycling operations in light of an overall land requirement for 73 hectares by 2020. The location and the access to a range of transport modes support the identification for a waste/recycling facility.
- 3.23 The owners are committed to providing a flagship mixed use development that responds to demand, notably in the Asian community. This is a commendable objective but it is now questionable as to whether this development is viable and can progress at this time and in this location.

#### Transport

- 3.24 A number of transport improvements are identified, often related to development of nearby sites. These include improvements to roads and pedestrian movement, such as footbridges.

#### Climate change

- 3.25 The document identifies two current industrial locations for mixed use development that specifically includes zero-energy or low carbon residential development. Officers within the planning service are working alongside potential developers to realise these developments.
- **No. 39: Alpine House in Queensbury:** Presents an opportunity to provide a zero energy or low carbon residential scheme alongside around 3000m<sup>2</sup> of workspace that is fit for modern operational standards within a suburban setting.
  - **No. 36: Abbey Estate along the Grand Union Canal in Alperton:** An opportunity to introduce modern workspace and zero energy or low carbon residential development that should contribute to improving the

character of Alpertton and making better use of the canal setting. This allocation, along with others in the vicinity, are part of proposals to encourage housing development within 'growth areas' (as defined within the Core Strategy) while improving the aesthetic and environmental character of the area.

The Comments of Planning Committee 31/1/07

3.26 The draft Site Specific Allocations preferred options document was reported to Planning Committee 31/1/07 and members made a number of observations. The views and decision of Executive with regard to these observations are sought. Committee made the following observations.

3.27 Allocation number **22: Metro House, 1-3 The Mall.**

The text of the preferred option section should alternatively read:

*“Residential development including family housing with 3 bedroom and over dwellings. Dwellings should normally be 2 and 3 storeys although there may be limited scope for higher buildings at appropriate locations with buildings of up to 4 and 5 storeys. Proposals must include the provision of new amenity space.*

3.28 The effect of this change is to qualify the location of higher density development within the site. This change is recommended by your officers.

3.29 Allocation number **42: Kingsbury Library and Community Centre, Stag Lane.**

The text of the preferred option should alternatively read:

*“Mixed use including new and improved library and community centre and residential development. Proposals must include the retention of the Pupil Referral Unit current on site. The Council will produce planning guidance that includes this site.”*

3.30 The effect of this change is that the library should remain on site and not be provided elsewhere in the vicinity. Your officers do **not** recommend this change as this may directly conflict with possible decisions with regard to the relocation of the library into the Kingsbury One Stop Shop facility.

3.31 In addition, officers recommend that the text should require the re-provision of the Pupil Referral Unit service or entail some other Council or community based service or facility in its place should the Unit be displaced.

3.32 Allocation number **51: Dollis Hill House, Gladstone Park.**

The text of the preferred option section should read:

*“Food and drink, community use, conference and hospitality facilities and associated car parking within the curtilage of the allocation to secure the restoration and use of Listed Building.”*

3.33 The effect of this change is to be clear that car parking will only be acceptable within the curtilage of the allocation and will not impact on the recently

restored gardens. Although text within the preferred option section refers only to the land within the red line, your officers recommend this change.

3.34 Allocation number **58: Prince of Wales Public House.**

The description section should alternatively read:

*“Former public house set back from Kingsbury Circle roundabout adjacent to retail uses.”*

3.35 The effect of this change is to recognise that the public house building has now in fact been demolished. This change is recommended by your officers.

3.36 Allocation number **84: Lonsdale Road, Kilburn.**

The text of the preferred option section should alternatively read:

*“Mixed use including residential and managed affordable / creative workspace and education use on the corner of Lonsdale Road and Salusbury Road. Options to explore new pedestrian access into Paddington Cemetery from Lonsdale Road will be sought. Improved access along Lonsdale Road will be required as part of any development.”*

3.37 The effect of this change is to remove references to the promotion of the allocation for food and drink uses. Planning Committee considers that the access road and pedestrian facilities could not accommodate vehicles and pedestrian movement that would be generated by food and drink uses. In addition Planning Committee resolved that the allocation should recognise the difficulties of introducing access into the Paddington Cemetery. This change is recommended by your officers.

3.38 Allocation number **100: Canterbury House.**

The text of the description section should alternatively read

*“Offices within locally Listed building, motor vehicle sale and repair and vehicle storage set between rail line and Canterbury Road, adjacent to primary school.”*

The text of the Unitary Development Plan 2004 status section should alternatively read:

*“Major Estate Regeneration Area, part promoted for residential development. Canterbury House is a locally Listed building.”*

The text of the preferred option section should alternatively read:

*“Mixed use development including office space utilising the locally Listed building, community facilities and residential development. Proposals should have regard for required access to the rail line for statutory undertakers.”*

The text of the justification section should alternatively read:



*“Contributing to the continued development of South Kilburn through increasing the supply of affordable residential accommodation and offices in the area while utilising and securing the locally Listed building. “*

- 3.39 The effect of these changes is to acknowledge that Canterbury House is a locally Listed building and that the viable re-use of the building is sought as part of proposals. This change is recommended by your officers.

Conclusion

- 3.40 Executive is asked to agree the Site Specific Allocations (preferred options) for public consultation. The consultation will be carried out during April and May 2007. The results of this consultation will be reported back to Planning Committee for consideration and the Executive for decision in due course.

#### **4.0 Financial Implications**

- 4.1 An allowance was made in the 2005/6 budget for costs over and above staff costs including that for consulting upon and publishing the LDF. Most of the funding required has been met from the Planning Delivery Grant. Government officials have made it clear that the Planning Delivery Grant (PDG) should be used to meet additional resource requirements of the new system. The costs of consulting upon the LDF will be met from the Planning Service budget for 2006/ 7.

- 4.2 There will be significant capital investment needs and additional running costs as a result of housing and population growth. A fundamental point, however, is that it will be more cost effective to channel growth into key growth areas because there will be greater certainty over the scale, nature and phasing of development and the impacts can be assessed more easily and therefore the infrastructure needed more easily identified. It also allows a coherent business case to be put to government departments for future funding projects.

#### **5.0 Legal Implications**

- 5.1 The Planning and Compulsory Purchase Act 2004 has changed the statutory basis for drawing up development plans in England and Wales. The Unitary Development Plan and Supplementary Planning Guidance will be replaced by a Local Development Framework. The Council is required to carry out pre-submission consultation by regulation 26 of The Town and Country Planning (Local Development) (England) Regulations 2004.

- 5.2 Guidance for the preparation of the Site Specific Allocations document and other constituent parts of the Local Development Framework is contained within Planning Policy Statement 12. It says:

*Where land is allocated for specific uses (including mixed uses), this should be made in one or more development plan documents. The identification of sites should be founded on a robust and credible assessment of the suitability, availability and accessibility of land for particular uses or mix of uses.*

*Policies relating to the delivery of the site specific allocations, such as critical access requirements or broad design principles which may be sought, must be set out in a development plan document. They may be in the site allocation(s) development plan document(s), in an area action plan or in a separate development plan document. They should not form part of the core strategy. Where the policy requirement is set out for land allocated in a development plan document, greater policy detail may be included in a supplementary planning document, for example a development brief or design brief.*

## **6.0 Diversity Implications**

- 6.1 Full statutory public consultation has been, and will continue to be, carried out in the preparation of this development plan document, which will include seeking the views of different groups across the Borough. An Equalities Impact Assessment of the LDF process has been produced, and officers will consider if the Site Specific Allocations bring forward any other issues not identified at that stage.

## **7.0 Staffing/Accommodation Implications (if appropriate)**

- 7.1 The preparation of the document and management of the process of inclusion and sustainability appraisal has been included within the work programme of officers within the Policy and Projects team of the planning service.

### **Background Papers**

Site Specific Allocation preferred options: Report to Committee 31/1/2007

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## Appendix 2: Sustainability Appraisal.

# Brent's Site Specific Allocations

## Sustainability Appraisal Commentary on the Draft Preferred Options

### Summary of SA recommendations and proposed changes to the draft SSA Preferred Options

#### 1. Proposed changes to the list of allocated sites

- The initial work on the SA has not identified any sites which it would recommend are not included as an allocated site in the Preferred Options.

#### 2. Proposed changes to the preferred use of the allocated sites

- The initial work on the SA has not identified any allocated sites which it would recommend have a different preferred use as that which is included in the Preferred Options.

#### 3. Proposed additional requirements / conditions on the development of the allocated sites suggested

- The initial work on the SA has identified some allocated sites for which it would recommend additional requirements / conditions are mentioned in the descriptions of the preferred uses. In particular, several sites are within a flood risk zone or are over 1 ha and should be the subject of a flood risk assessment. Other sites located in areas of open space deficiency, nature conservation importance or poor accessibility by public transport / low PTAL score, for example, should include reference to the appropriate conditions on their development in the descriptions of the preferred uses. These issues are dealt with in some of the descriptions of the preferred uses, but not in all cases where relevant.

#### 4. Other general comments / recommendations

- Add specific objectives for the SSA at the start of the document to convey what it is aiming to achieve.
- Add a schedule and map of allocated sites.
- It would be useful to indicate within the SSA Preferred Options document approximately how far the implementation of the preferred sites included could go in delivering the levels of growth that is being sought in the borough as set out in the Core Strategy Preferred Options.
- Planning briefs or other guidance are useful mechanisms to deliver the mitigation and enhancement proposed by the SA for particular sites. Consideration should be given to preparing additional planning briefs or other guidance where the SA has flagged up particular issues with a site – where this is relevant will be identified as part of the ongoing SA work prior to public consultation
- Add reference to the environment in section 3 on Brent's issues, with generic comments on how noise, air quality and contaminated land for example should be addressed by the allocated sites.

## 1. Introduction

### Sustainability Appraisal of Development Plan Documents

- 1.1 The purpose of Sustainability Appraisal (SA) is to promote sustainable development through better integration of sustainability considerations into the preparation and

adoption of plans. The SA will consider the Development Plan Documents' (DPDs) implications, from a social, economic and environmental perspective, by assessing options and the draft DPDs against available baseline data and sustainability objectives.

- 1.2 SA is mandatory for Local Development Documents (LDDs) under the requirements of the Planning and Compulsory Purchase Act (2004)<sup>1</sup>, which includes DPDs. Article 19 (5) states that the local planning authority must also “(a) carry out an appraisal of the sustainability of the proposals in each document; (b) prepare a report of the findings of the appraisal”. The Act also requires that SA is an integral part of the LDF production process.
- 1.3 The Government’s guidance on Strategic Environmental Assessment (SEA)<sup>2</sup> indicates that SAs of DPDs are also likely to need to fully incorporate the requirements of the European Directive 2001/42/EC, known as the SEA Directive. This Directive is transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004<sup>3</sup> – the SEA Regulations.
- 1.4 In November 2005 the Government published guidance entitled Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks<sup>4</sup>. While SEA and SA are distinct processes, the SA guidance adopts an approach to appraisal which also integrates the requirements of the SEA Directive and Regulation.

## **Sustainability Appraisal method and programme**

- 1.5 The SA process for the London Borough of Brent (LBB) DPDs is following that set out in Government guidance<sup>5</sup>. Initially the SAs for all three of the DPDs being prepared by LBB (the Core Strategy, Development Control policies and Site Specific Allocations) were undertaken in parallel and a single SA Scoping Report was prepared and consulted upon in June 2005. The SA of the Core Strategy was then undertaken, with the SA Report prepared to accompany public consultation on the Core Strategy Preferred Options in October 2006.
- 1.6 The SA of the Site Specific Allocations (SSAs) commenced in August 2006, with more concentrated work starting in December 2006 when a more refined list of sites and information was available. The current list of preferred sites was made available by LBB on 6<sup>th</sup> February 2007. Given the strategic nature of SA and the number of site allocations proposed, it is not possible or appropriate to undertake a detailed assessment of the individual site. This should be borne in mind in using the SA’s findings. In addition to the SA, LBB has undertaken an appraisal (informed by public consultation at the LDF Issues and Options stage) of the sites against planning criteria to help determine whether a site should be included.

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<sup>1</sup> <http://www.legislation.hmso.gov.uk/acts/acts2004/20040005.htm#aofs>

<sup>2</sup> ODPM (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*.

<sup>3</sup> Statutory Instrument 2004 No. 1633.

<sup>4</sup> ODPM (2005) *Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks*.

<sup>5</sup> Note that the SA of Brent’s three DPDs has been commissioned from Collingwood Environmental Planning (CEP), external consultants working with the planning policy team.

- 1.7 For the SA of the SSA, an appraisal was undertaken of each site allocation in the Preferred Options document with reference to a series of issues / constraints and opportunities. To assist this process, the LBB planning policy team were asked to fill in a proforma which covered these key constraints and opportunities for each site. LBB was provided with five different proformas according to the preferred use of the site (e.g. housing, employment, community, transport and mixed use). To support the proformas, key constraints and opportunities were also analysed using GIS<sup>6</sup>.
- 1.8 The SA of the Development Control (DC) policies has just commenced with receipt of the first tranche of draft DC policies (9<sup>th</sup> February 2007). Public consultation on the preferred options for the SSA and DC policies, along with the SA Report(s), is currently scheduled to commence on 30<sup>th</sup> April 2007.

## **2. Initial Sustainability Appraisal Commentary**

- 2.1 The purpose of this note is to provide an initial commentary and recommendations, from a sustainability perspective, on the LBB's draft SSA Preferred Options. The version of the SSA Preferred Options considered in this note is that supplied by LBB on 6<sup>th</sup> February 2007<sup>7</sup>. Given the limited time available, the commentary focuses on the key initial findings that could result in proposed changes to the draft Preferred Options document. The SA process will continue over the coming months until the completion of the SA Report in April 2007.
- 2.2 This note aims to identify the key findings from the SA to date on the current draft of the Preferred Options to inform its possible revision by LBB officers, prior to its submission to the Executive for consideration at their March 2007 meeting. The note emphasises in particular any changes that are recommended to the document. The final Preferred Options will be the subject of more detailed reporting of the SA's findings in an SA Report to be circulated as part of public consultation on the Preferred Options in May 2007.
- 2.3 It should be noted that the findings of the SA already undertaken on the Core Strategy Preferred Options (October 2006) should be borne in mind in reading the following comments as the policies in the Core Strategy profile the context and justification to the need for and preferred uses of the site allocations. The forthcoming findings of the SA of the DC policies will also need to be reflected and incorporated as necessary in the final SA of the SSA Preferred Options. Summaries of the potential effects and suggested mitigation / enhancement measures for four of the key policies in the Core Strategy Preferred Options SA Report relevant to the site allocations are included in Appendix 1 to this note. These are for the following policies in the Spatial Strategy:
- CP SS1: Key Principles for Development
  - CP SS2: Population and Housing Growth
  - CP SS3: Focus of Growth

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<sup>6</sup> Geographical Information System

<sup>7</sup> Note that the Planning Committee's comments (31/01/07) have not been considered at this stage

- CP SS4: Commercial Regeneration

### 3. General Comments

#### Objectives of the SSA Preferred Options

3.1 Section 1 of the draft Preferred Options document includes a section on ‘Why identify Site Specific Allocations’, which includes the following reasons:

- “The Council may seek development of a particular type and scale that would not necessarily be delivered through the usual relationship between the development industry and the planning system”.
- “The Council may believe that there are specific needs for particular uses such as schools and health facilities or new commercial floor space”.

3.2 For the purposes of the SA process, which includes a task to “test the DPD objectives against the sustainability objectives”, and for the clarity of the document it is recommended that specific objectives for the SSA are included to convey what the document is aiming to achieve. These could include, for example:

- To facilitate the supply of land for homes, employment space, community uses, etc to deliver the policies in the Core Strategy, such as policy SS2 – *Population and Housing growth*.
- To direct the type of uses that is likely to be appropriate for particular sites.
- To provide specific criteria for the development of particular sites.

#### Details of the Site Allocations

3.3 It would be useful for consultees to include a schedule of all the sites allocated and a location map of all the sites at the start of Section 4 of the draft Preferred Options document. A similarly schedule and location map at the start of Section 5 of all the sites allocated considered but not included, would also be useful.

3.4 For information, for the purposes of the SA, a schedule and location map of all the allocated sites has been produced (see Tables 1 – 3 and Figure 1<sup>8</sup>).

**Table 1: Sites in Brent’s North Planning Team Area**

11	London Transport Recreation Ground, Forty Avenue	Barnhill	4.3	Community (School)
12	Brent Town Hall, Forty Lane	Barnhill	2.1	Mixed (offices, housing, community)
19	Dollis Hill Estate, Brook Road	Dollis Hill	1.7	Mixed (school, employment)
22	Metro House, 1-3 The Mall	Barnhill	1.0	Housing
23	Morrison’s, West Moreland Road	Queensbury	2.3	Housing/ mixed (housing and retail)
25	Oriental City, Edware Road	Queensbury	3.0	Mixed (housing, retail, food & drink, community and leisure)
39	Alpine House, Honey Pot Lane	Queensbury	0.9	Mixed (housing and affordable workspace)
42	Kingsbury Library and Community Centre, Stag Lane	Fryent	0.5	Mixed (library and community centre and housing)
49	Garages at Barn Hill, Barn Hill Road	Barn Hill	0.08	Housing
51	Dollis Hill House, Gladstone Park	Dollis Hill	0.2	Mixed (food & drink, community,

<sup>8</sup> Note that site 82 is missing from all the maps as it was not included in the latest GIS file provided by LBB.

				conference and hospital plus car parking)
53	Gavin/Station House, Neasden Lane	Welsh Harp	0.14	Mixed (residential, retail, food and drink)
56	The Lancer PH, Kenton Road	Kenton	0.14	Mixed (residential and retail and/or food and drink)
57	Sainsbury's Car Park, Draycott Avenue	Kenton	0.6	Residential with some retail car parking
58	Prince of Wales PH, Kingsbury Circle	Queensbury	0.3	Mixed (housing, retail and/or food and drink)
59	Theoco Garage, 3-5 Burnt Oak Broadway, Edgware	Queensbury	0.4	Mixed (housing and retail)
62	655 North Circular Road	Dollis Hill	5.1	Regeneration of industrial estate
63	Old St Andrew's Church, Old Church Lane	Welsh Harp	0.8	Community facility including place of worship
85	Capitol Way	Queensbury	3.15	Mixed (retail / car showroom with residential above)
87	Kingsbury High School, Princes Avenue and Bacon Lane	Queensbury and Fryent	10.7	Consolidation of High School campuses and recreation/sports
88	12-24 Carlisle Road	Queensbury	-	Highway widening
90	Barningham Way	Fryent	-	Highway widening
91	Oxgate Lane	Dollis Hill	-	Link road
92	Humber Road	Dollis Hill	-	Service road
93	Site Adjoining the Link, Staples Corner	Dollis Hill	-	Link road
104	Sarena House, Grove Park	Fryent	1.1	Mixed (housing and affordable workspace)
107	1-15 Holmstall Parade	Queensbury	-	Parking bays and landscaping

**Table 2: Sites in Brent's South Planning Team Area**

15	117-119 Malvern Road	Kilburn	0.16	Housing
16	Kilburn Square, Kilburn High Road	Kilburn	0.6	Mixed (housing, residential, community and market space)
17	Former State Cinema/ Mecca Bingo, Kilburn High Road	Kilburn	1.4	Mixed (community, arts and culture, retail, employment)
27a	Asiatic Carpets, High Road, Church End	Dudden Hill	2.3	Mixed (residential, employment)
27b	Ebony Court, High Road, Church End	Dudden Hill	0.5	Residential
27c	White Hart PH, High Road, Church End	Dudden Hill	0.4	Mixed (residential and indoor market)
27d	Church End local centre, High Road, Church End	Dudden Hill	1.4	Mixed (residential, retail and market space)
33	Mayo Road and St Mary's Open Space, Church End	Harlesden	2.0	Mainly housing subject to public open space
34	Queens Parade, Walm Lane, Willesden	Willesden Green	0.07	Mixed (retail and/or food and drink with residential above)
61	Queens Park Station, Salusbury Road	Kilburn	0.6	Mixed (residential, community, retail, open space and bus interchange)
71	Manor Park Road, Acton Lane	Harlesden	0.25	Housing
72	92a Villiers Road, Willesden	Willesden Green	0.2	Housing
73	103 Mount Pleasant Road, Brondesbury Park	Bondesbury Park	0.2	Housing
75	Hawthorn Road, Willesden	Willesden Green	0.2	Housing
80	Former Willesden Court House, St Mary's Road	Harlesden	0.15	Mixed (community facility with residential above)
82	387-395 Chapter Road	Willesden Green	0.25	Housing
84	Lonsdale Road, Kilburn	Queens Park	0.85	Mixed (retail/ food and drink, residential, affordable/creative workspace and education)
99	Junction of Sidmouth Road and Willesden Lane	Willesden Lane	-	Junction widening
100	Canterbury House, Canterbury Road	Kilburn	0.65	Mixed (office, community, residential)
103	Land rear of 12 - 14 Bridge Road	Harlesden	0.1	Housing

**Table 3: Sites in Brent's West Planning Team Area**

1	Atlip Site, Ealing Road, Alperton	Alperton	1.9	Mixed (housing, amenity, employment)
3	Twyford Tip, Abbey Road, Park Royal	Stonebridge	5.3	Mixed (waste facility, energy generation and employment)
4	Former Guinness Brewery, Park Royal	Stonebridge	8	Mainly employment but health/ and or education and some residential acceptable
5	Careys Site, Acton Lane, Park Royal	Stonebridge	2.5	Mainly employment and hospital expansion, with key worker housing for hospital workers
7	Former Unisys Site, North Circular Road	Stonebridge	2.85	Mixed (employment, sport and recreation, community, housing)
9	Vale Farm Leisure Centre	Sudbury	4.5	Indoor and outdoor sports and recreation
10	Northwick Park Hospital	Northwick	18.6	Hospital with ancillary retail and leisure and key worker housing for hospital workers
28	Wembley West End, Wembley High Road	Wembley Central	0.8	Mixed (retail, residential and car park)
32	Northfields Industrial Estate	Alperton	8.5	Mixed (employment and residential)
36	Abbey Estate, Beresford Avenue	Alperton	1.7	Mixed (work/live, affordable workspace and residential)
37	Dirkan Site, North End Road, Wembley	Tokyngton	0.5	Mixed (residential and workspace)
43	Abbey Manufacturing Estate, Woodside Close, Alperton	Alperton	1.2	Mixed (residential, amenity and workspace)
44	Sunleigh Road, Alperton	Alperton	1.6	Residential led mixed use
46	Carlyon Road, Ealing Road, Alperton	Alperton	2.6	Mixed (residential, amenity, employment)
83	Land Adjoining St Johns Church, 614 High Road	Sudbury	0.6	Mixed (residential and community facility)
97	Footbridge at Waxlow Road	Stonebridge	-	Footbridge
98	South Way	Tokyngton	-	Continuation and completion of Stadium Access Corridor
101	Shubette House/Karma House/Apex House/ Olympic Way	Tokyngton	0.89	Mixed (residential, hotel, office, workspace, leisure, food and drink)
102	Kelaty House/Wembley Stadium Industrial Estate	Tokyngton	5.4	Mixed (employment-led including leisure, offices and residential)
105	Brook Avenue, Wembley	Preston	0.9	Housing
106	Minavil House and Unit 7 Rosemont Road	Alperton	0.5	Mixed (affordable office and workspace and residential)

### Links to the Core Strategy policies

- 3.5 The SSA will assist in the implementation of several of the Core Strategy policies, such as the level of growth in population and housing in policy SS2, focus for growth in policy SS3, commercial development in policy SS4 and community needs in policy SS8. It would be useful to indicate within the SSA Preferred Options document approximately how far the implementation of the preferred sites included could go in delivering the levels of growth that is being sought in the borough. This could be in very approximate terms, for example it could be stated that approximately x% of the 10,146 additional homes planned between 2007 and 2017 could be delivered by the preferred sites. This would put into context the contribution these sites could make and the scale of additional sites that will be required.



### **Planning briefs or other guidance**

- 3.6 LBB has indicated that planning briefs or other guidance will be or has been prepared for several of the preferred site allocations – consideration should be given to referring to these in the descriptions of the preferred options for the applicable sites. Where these are planned for sites, these could be partly used to deliver the mitigation and enhancement proposed by the SA. Where it is warranted by the issues raised by the SA, it may be appropriate to consider preparing additional planning briefs or other guidance for particular sites. The SA will identify if this is recommended for particular sites as part of the ongoing SA work prior to public consultation.

### **Preferred uses of the sites**

- 3.7 At this stage, the SA has not identified any preferred uses for the allocated sites that we would recommend changing. The majority of the preferred uses are mixed use which is in accordance with Core Strategy policies (e.g. CP SS1, SS4 and SS7).

## **4. Comments on the Preferred Site Allocations**

### **Key findings and recommendations**

- 4.1 As mentioned above, an appraisal was undertaken of each site allocation in the Preferred Options document against a series of issues / constraints and opportunities using proformas completed by LBB planning policy team and GIS information. The criteria varied depending whether the preferred use of the site was housing, employment, community, transport or mixed use, but include:
- Access to most deprived areas
  - Location of sites in growth / strategic employment areas
  - Location of sites areas that are a priority for regeneration
  - Location of retail sites in town centres
  - Sites that will result in loss of open space
  - Sites that are located in areas of open space deficiency
  - Accessibility by public transport / PTAL Score of site
  - Distance to a GP, Primary Schools and Secondary Schools
  - Sites located in the proximity of nature conservation importance sites / SSSIs
  - Sites located in flood risk areas
  - Sites that affect listed buildings or are within a Conservation Area
  - Sites located within an existing MOL boundary
  - Sites within Air Quality Management Areas
  - Noise Levels
  - Sites located in greenfield land

4.2 Table 4 summaries the results of this appraisal. Key recommendations for changes to the draft Preferred Options document are highlighted in bold and underlined. Further details and recommendations site by site is provided in Tables 5, 6 and 7.

**Table 4: Summary of the initial appraisal findings for all the sites and recommended changes to the draft Preferred Options**

<p><b>Access to most deprived areas</b></p> <p>(for employment/ community/ mixed use including employment or community uses)</p>	<p>See Figure 2 which shows the relevant allocated sites and multiple indices of deprivation.</p> <p><b>South:</b> Most employment (including retail) or community sites or mixed sites that include either use are within or close to SOAs that are in the 10 or 20% most deprived. Two sites: 34 Queens Parade and 84 Lonsdale Road are accessible from SOAs in the 30% most deprived.</p> <p><b>North:</b> The following sites which include employment and/or community are within or close to the 10 to 20% most deprived: 11 London Transport Ground and 12 Brent Town Hall. Three other sites are within or adjacent to SOAs in the 30% most deprived: 19 Dollis Hill Estate, Brook Road, 51 Dollis Hill House and 87 Kingsbury High School.</p> <p><b>West:</b> The following sites are within or adjacent to the 10 or 20% most deprived SOAs: 3 Twyford Tip, 4 Former Guinness Brewery, 5 Carey's Site, 7 Former Unisys Site, 28 Wembley West End and 32 Northfield Industrial Estate. Site 83 Land Adjoining St John's Church is within or adjacent a SOA in the 30% most deprived.</p> <p><i>Note: based on GIS information only</i></p>	<p>Promoting growth and regeneration in the most deprived parts of the borough an important objective underpinning the Core Strategy. This is particularly important factor for the employment and community allocations.</p> <p>The appraisal found that the majority of the employment (including retail) or community sites or mixed sites that include either use were within or close to SOAs that are in the 10 or 20% most deprived. The few sites not within or near the most deprived areas are justified by being near / within a growth area or being the redevelopment of existing use providing employment (e.g. site 10 Northwick Park Hospital)</p> <p><b>Recommended changes: <u>None</u></b></p>
<p><b>Location of sites in growth/ strategic employment areas</b></p> <p>(for employment/ community/ mixed use including employment or community uses)</p>	<p>The following employment (including retail) or community sites or mixed sites that include employment and/or community uses are <u>not</u> in strategic employment or growth areas:</p> <p><b>North:</b></p> <ul style="list-style-type: none"> <li>• 19 Dollis Hill Estate, Brook Road</li> <li>• 39 Alpine House</li> <li>• 42 Kingsbury Library</li> <li>• 53 Gavin House/ Station House</li> <li>• 63 Old St. Andrews Church</li> <li>• 87 Kingsbury High School</li> </ul> <p><b>West:</b></p> <ul style="list-style-type: none"> <li>• 9 Vale Farm Leisure Centre</li> <li>• 10 Northwick Park Hospital</li> </ul> <p><b>South:</b></p> <ul style="list-style-type: none"> <li>• 34 Queens Parade</li> <li>• 80 Former Willesden Court House, St Mary's Road</li> </ul> <p><i>Note: Based on information from proformas filled in by LBB's officers</i></p>	<p>Policy CP SS4 on Commercial Regeneration promotes Park Royal, Staples Corner, Wembley/ Neasden and East Lane as strategic industrial/ business locations where redevelopment for incompatible uses will be resisted, new development for business and industry will be encouraged, and investment in new infrastructure, such as transport improvements will be focused. In addition mixed use development, including employment generating uses, will be promoted in town centres and in the Wembley regeneration area.</p> <p>The majority of the relevant allocated sites are within strategic employment or growth areas. The few sites allocated outside these areas are generally small sites or are proposed for community uses (e.g. schools, hospitals, places or worship etc).</p> <p>Loss of employment land to other uses (particularly residential) in areas where employment is a priority appears to have been avoided.</p> <p><b>Recommended changes: <u>None</u></b></p>
<p><b>Location of sites areas that are a priority for</b></p>	<p>The following sites (housing or mixed use including residential) are not located in areas that are a priority for regeneration:</p> <p><b>North:</b></p>	<p>Areas that are a priority for regeneration or growth benefit from good accessibility by public transport. Core Policy SS3 requires that these areas should be the focus for population growth and housing development. However, housing development</p>

<p><b>regeneration</b></p> <p>(for housing/ community/ mixed use including residential and community use)</p>	<ul style="list-style-type: none"> <li>• 22 Metro House, 1-3 The Mall</li> <li>• 23 Morrison's West Moreland Road</li> <li>• 49 Garages at Barn Hill, Barn Hill Road</li> <li>• 56 The Lancer PH, Kingsbury Circle</li> <li>• 57 Sainsbury's Car Park, Draycott Avenue</li> <li>• 58 Prince of Wales PH, Kingsbury Circle</li> </ul> <p><b>South:</b></p> <ul style="list-style-type: none"> <li>• 82 387-395 Chapter Road</li> </ul> <p><b>West:</b></p> <ul style="list-style-type: none"> <li>• 83 Land Adjoining St John's Church, 614 High Road</li> </ul> <p><i>Note: Based on information from proformas filled in by LBB's officers</i></p>	<p>outside these areas can be justified as it would contribute to delivering the additional homes that LB Brent are require to accommodate and would also contribute to the provision of affordable homes, which Brent is aiming to account for 50% of all new homes (see CP SS2).</p> <p>Where accessibility by public transport is an issue, the description of the preferred use of site should make reference to improvements (see section on accessibility below). The density of housing (i.e. dwellings per hectare) should reflect the PTAL score of the site, i.e. low densities are appropriate for areas with low scores<sup>9</sup>.</p> <p><b><u>Recommended changes: Add reference to the need to improve public transport, walking and cycling under the referred use of all relevant sites</u></b> – see section below on accessibility</p>
<p><b>Location of retail sites in town centres</b></p> <p>(for sites that include retail)</p>	<p>This has been inconsistently completed in the proformas and therefore at this stage no assessment can be made.</p>	<p>Wembley town is designated as the principal retail location within the borough and major new retail or leisure development will only be permitted in other town centres or edge-of-centre locations, if it can be demonstrated that no sequentially preferable sites are available in Wembley (CP TC1 Principal Retail Location).</p> <p>Town centres are most accessible to a choice of transport modes, particularly walking, cycling and public transport (CP para. 9.2.4)</p> <p><b><u>Recommended changes: None</u></b> – additional information on retail sites required for the final SA</p>
<p><b>Sites that will result in loss of open space</b></p>	<p>Development of site 11 London Transport Recreation Ground (North) would result in some loss of open space. However, the majority of open space would be maintained and the development of the site would provide sports and recreational facilities open to the public.</p> <p>Development of site 9 Vale Sports Centre (West) would also possibly result in the loss of open space. However, the preferred use would result in improved sports and recreational facilities.</p> <p><i>Note: Based on information from proformas filled in by LBB's officers</i></p>	<p>Open space should be protected in all but exceptional circumstances. Policy CP SS3 Protecting the Built and Natural Environment states that '<i>Development will not generally be permitted on the Borough's open spaces</i>'.</p> <p>The draft DC Policy OS6 reiterates this and states that development on open space will only be permitted where a series of criteria can be demonstrated, including that '<i>the open character is maintained and open space enhanced for outdoor amenity and leisure us</i>'.</p> <p>In the two cases highlighted, the circumstances would appear to justify the preferred uses. However, appropriate conditions will need to be applied to the sites.</p> <p><b><u>Recommended changes: None. A planning brief may be a useful vehicle to deliver the preferred use for site 11 – this requirement could be specifically referenced in the description of the preferred use.</u></b></p>
<p><b>Sites that are located in areas of open space deficiency</b></p> <p>(for housing/ mixed)</p>	<p>Numerous housing or mixed use including residential sites are located in areas of open space deficiency. See Figure 3.</p> <p><i>Note: Based on information from proformas filled in by LBB's officers and GIS information</i></p>	<p>In areas of open space deficiency, opportunities to improve public and private outside space should be sought as part of the development of any of these allocated sites as required by the policies cited below. This requirement should be included in the description of the preferred use of sites that are located in areas of open space deficiency.</p> <p>Core Strategy , para. 6.4.8: '<i>where development</i></p>

<sup>9</sup> See Table 3, Section 3.5.1 of 2004 London Housing Capacity Study

<p>use including residential sites)</p>		<p>would result in additional pressure on existing public open space, particularly where public open space is not easily accessible by foot, cycling or public transport, to a proposed development, on-site provision or contributions towards new or improved public open space, nature conservation and play facilities will be required. Usable on-site amenity space will also be required within new residential developments'. Policy CP OS1 states that 'New or improved provision will be sought in areas of deficiency, and where additional pressure on open space and outdoor play facilities would be created'.</p> <p>The draft DC Policy OS7 on the provision and enhancement of open space and nature conservation, requires that 'Adequate provision for new or improved open space and sites for nature conservation will be required from all major developments. Where this cannot be provided, compensation will be sought through appropriate conditions or contributions towards the value of new or enhanced provision elsewhere in the Borough'</p> <p><b>Recommended changes: include mention of open space requirements in the description of the preferred use of allocated sites that are located in areas of open space deficiency and that include an element of housing, where this is not currently included</b> – see tables 5, 6 and 7 for site by site comments.</p>
<p><b>Accessibility by public transport / PTAL Score of site</b></p>	<p>See Figure 4 which shows the accessibility of allocated sites to public transport.</p> <p>The following sites would require improvements to accessibility by public transport or/ and have low PTAL scores<sup>10</sup>:</p> <p><b>North:</b></p> <ul style="list-style-type: none"> <li>• 19 Dollis Hill Estate, Brook Road</li> <li>• 22 Metro House, 1-3 the Mall</li> <li>• 25 Oriental City, Edgware Road</li> <li>• 39 Alpine House, Honey Pot Lane</li> <li>• 42 Kingsbury Library and Community Centre</li> <li>• 49 Garages at Barn Hill</li> <li>• 51 Dollis Hill House, Gladstone Park</li> <li>• 59 Theoco Garage, 3-5 Burnt Oak Broadway, Edgware</li> <li>• 62 655 North Circular Road</li> <li>• 63 Old St. Andrews Church</li> <li>• 85 Capitol Way</li> <li>• 87 Kingsbury High School</li> <li>• 104 Serena House</li> </ul> <p><b>South:</b></p> <ul style="list-style-type: none"> <li>• 73 103 Mount Pleasant Road</li> <li>• 75 Hawthorn Road</li> <li>• 103 Land Rear of 12-14 Bridge Road</li> </ul> <p><b>West:</b></p> <ul style="list-style-type: none"> <li>• 4 Former Guinness Brewery</li> <li>• 5 Careys Site, Acton Lane</li> </ul>	<p>Development should occur in locations that are accessible by public transport, walking and cycling (Core Policy SS7 Sustainable Communities).</p> <p>Where a site is not accessible by public transport, walking and cycling contributions to improvements should be sought from developments in accordance with Core Policy CP TRN1. This is referred to in the preferred use of some relevant sites, but not all.</p> <p>The density of housing (i.e. dwellings per hectare) should reflect the PTAL score of the site, i.e. low densities are appropriate for areas with low scores<sup>11</sup>.</p> <p><b>Recommended changes: include mention of requirements to improve public transport, walking and cycling in the description of the preferred use of allocated sites with a low PTAL score, where this is not currently included. Where planning briefs are proposed, these could include details of these requirements</b> – see tables 5, 6 and 7 for site by site comments.</p>

<sup>10</sup> Public transport accessibility levels (PTALs): 'A measure of the relative accessibility of buildings and uses with the higher the PTAL score, the better the accessibility. A score of four would apply to town centre sites indicating that higher density development was possible.' <http://www.pas.gov.uk/pas/core/page.do?pageld=12492>

<sup>11</sup> See Table 3, Section 3.5.1 of 2004 London Housing Capacity Study

	<ul style="list-style-type: none"> <li>• 9 Vale Farm Leisure Centre</li> <li>• 32 Northfields Industrial Estate</li> <li>• 36 Abbey Estate, Beresford Avenue</li> <li>• 43 Abbey Manufacturing Estate, Woodside Close</li> <li>• 44 Sunleigh Road</li> <li>• 46 Carlyon Road</li> <li>• 102 Kelaty House/ Wembley Stadium Industrial Estate</li> </ul> <p><i>Note: Based on information from proformas filled in by LBB's officers and GIS information</i></p>	
<b>Distance to a GP</b> (for housing/ mixed use including residential sites)	Whilst included in the proformas, this criterion has not been evaluated here as this will be a very site specific issue to deal with during the development of proposals for a particular site. General pressure on community services etc is dealt with in the Core Strategy Preferred Options SA.	-
<b>Primary Schools</b> (for housing/ mixed use including residential sites)	Whilst included in the proformas, this criterion has not been evaluated here as this will be a very site specific issue to deal with during the development of proposals for a particular site. General pressure on community services etc is dealt with in the Core	-
<b>Secondary Schools</b> (for housing/ mixed use including residential sites)	Whilst included in the proformas, this criterion has not been evaluated here as this will be a very site specific issue to deal with during the development of proposals for a particular site. General pressure on community services etc is dealt with in the Core	-
<b>Sites located in the proximity of nature conservation importance sites/ SSSIs</b>	<p>See Figure 5 which shows the allocated sites and nature conservation designations.</p> <p><b>SSSIs</b></p> <p>Site 62 655 North Circular Road (<b>North</b>) is adjacent to Welsh Harp Reservoir which is an SSSI, local nature reserve and Grade 1 Nature Conservation Site.</p> <p><b>Green Chains</b></p> <p>The following sites (all of them in <b>West</b> planning area except for number 49, <b>North</b>) are adjacent/ part of the site is a Green Chain:</p> <ul style="list-style-type: none"> <li>• 1 Atlip Site</li> <li>• 3 Twyford Tip</li> <li>• 32 Northfields Industrial Estate</li> <li>• 36 Abbey Estate, Beresford Avenue</li> <li>• 44 Sunleigh Road</li> <li>• 46 Carlyon Road</li> <li>• 49 Garages at Barn Hill</li> <li>• 97 Waxlow Road</li> <li>• 106 Minavil House</li> </ul> <p><b>Nature Conservation Site - Grade 1 and 2</b></p> <p>The following sites are adjacent or in a Nature Conservation site (grade 1 or 2):</p> <p><b>North:</b></p> <ul style="list-style-type: none"> <li>• 11 London Transport Sports Ground</li> <li>• 49 Barnhill Garages, Barnhill Road</li> <li>• 51 Dollis Hill House</li> <li>• 57 Sainsbury's Car Park, Draycott Avenue</li> <li>• 62 655 North Circular Road</li> <li>• 63 Old St Andrews Church</li> <li>• 87 Kingsbury High School</li> </ul> <p><b>South:</b></p>	<p>In taking forward proposals for any of the sites within or adjacent to areas of importance for nature conservation, it should be done in accordance with the relevant Core Strategy policies and forthcoming DC policies.</p> <p>Further work as part of the SA is needed to check any sites which affect the Blue Ribbon Network – in accordance with the draft DC Policy OS2: green chains and blue ribbon network. This policy includes the criteria under which development will be permitted on or adjacent to these sites. In addition, any sites near to main or ordinary watercourses should include appropriate buffer strips agreed in consultation with the Environment Agency.</p> <p><b>SSSIs</b></p> <p>The draft DC OS3 SSSIs states that: 'Development on or adjacent to SSSIs will only be permitted where it is clearly demonstrated that there will be nil or negligible adverse effects on biodiversity and nature conservation'. This will need to be the case with site 62.</p> <p><b>Other nature conservation sites and areas</b></p> <p>The draft DC Policy OS4 on local nature reserves, sites of important nature conservation and wildlife corridors states that: 'Development on or adjacent to Local Nature Reserves, Sites of Important Nature Conservation and Wildlife Corridors must conserve and enhance the special interest features appropriate to the hierarchy of designation, with Local Nature Reserves, Sites of Metropolitan and Borough I Importance given the highest priority'.</p> <p>Appropriate reference to these requirements should be included in the descriptions of the preferred use of relevant allocated sites.</p>

	<p>33 Mayo Road and St Mary's Open Space 84 Lonsdale Road</p> <p><b>West:</b></p> <ul style="list-style-type: none"> <li>• 3 Twyford Tip</li> <li>• 4 Former Guinness Brewery</li> <li>• 7 Former Unisys Site</li> <li>• 10 Northwick Park Hospital</li> <li>• 32 Northfield Industrial Estate, Beresford Avenue</li> <li>• 36 Abbey Estate, Beresford Avenue</li> <li>• 37 Dirkan Site, North End Road</li> <li>• 97 Waxlow Road Footbridge</li> <li>• 105 Brook Avenue</li> </ul> <p><b>Wildlife Corridors</b></p> <p>The following sites are adjacent or in a Wildlife Corridor:</p> <p><b>North:</b></p> <ul style="list-style-type: none"> <li>• 23 Morrison's West Moreland Road</li> <li>• 39 Alpine House, Honey Pot Lane</li> <li>• 57 Sainsbury's Car Park, Draycott Avenue</li> </ul> <p><b>West and South:</b></p> <ul style="list-style-type: none"> <li>• 97 Waxlow Road Footbridge (<b>West</b>)</li> <li>• 100 Canterbury House (<b>South</b>)</li> </ul> <p><i>Note: SSSIs, Green Chains and Nature Conservation site information obtained through GIS mapping. Wildlife Corridor information obtained from proformas filled in by LBB's officers.</i></p>	<p><b><u>Recommended changes: include mention of requirements to protect and enhance nature conservation in the description of the preferred use of allocated sites, where this is not currently included. Where planning briefs are proposed, these could include details of these requirements</u></b> – see tables 5, 6 and 7 for site by site comments.</p>
<p><b>Sites located in flood risk areas</b></p>	<p>See Figure 6 which shows the allocated sites and flood risk zones.</p> <p>Parts of the following site allocations are in the 1 in 100 flood risk zone (zone 3):</p> <p><b>North:</b></p> <ul style="list-style-type: none"> <li>• 39 Alpine House, 49 Barnhill Garages, 23 Morrison's Westmoreland Road</li> </ul> <p><b>West:</b></p> <ul style="list-style-type: none"> <li>• 3 Twyford Tip,</li> <li>• 7 Former Unisys Site (this site is almost completely in the floodplain)</li> <li>• 32 Northfields Industrial Estate</li> <li>• 101 Shubette House,</li> <li>• 105 Brook Avenue</li> </ul> <p>In addition, allocation number 37 (North End Road) is completely within the 1 in 100 flood risk zone.</p> <p><i>Note: the above information obtained from GIS mapping and EA flood risk maps.</i></p> <p>In addition, the following sites are not located in flood risk areas but are 1 hectare of greater size and would require a FRA:</p> <p><b>North:</b></p> <ul style="list-style-type: none"> <li>• 11 London Transport Recreation Ground, Forty Avenue</li> <li>• 12 Brent Town Hall, Forty Lane</li> <li>• 19 Dollis Hill Estate, Brook Road</li> </ul>	<p>PPS25 requires that planning applications for development proposals of 1 hectare or greater in Flood Zone 1 and all proposals for new development located in Flood Zones 2 and 3 should be accompanied by a Flood Risk Assessment (FRA), this is reflected in paragraph 6.3.3 of the Core Strategy preferred options. This should identify and assess the risks of all forms of flooding to and from the development and demonstrate how these flood risks will be managed, taking climate change into account. A FRA must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall<sup>12</sup>.</p> <p>In addition, LB Brent should undertake a Strategic Flood Risk Assessment of the whole Borough in consultation with the Environment Agency as required by PPS25<sup>13</sup> - as referred to in para 6.3.3 of the Core Strategy Preferred Options.</p> <p>Also note the comment above under nature conservation on the need for any sites near to main or ordinary watercourses to include appropriate buffer strips agreed in consultation with the Environment Agency – this could be added to the description of the preferred use for relevant sites.</p> <p>For sites outside flood risk areas, but of over 1ha, Sustainable Urban Drainage (SUDs) will be particularly important. Where a planning brief is being prepared for sites, these requirements should be included.</p>

<sup>12</sup> Ref to PPS25

<sup>13</sup> Ref to PPS25

	<ul style="list-style-type: none"> <li>• 22 Metro House, 1-3 The Mall</li> <li>• 25 Oriental City, Edware Road</li> <li>• 62 655 North Circular Road</li> <li>• 85 Capitol Way</li> <li>• 87 Kingsbury High School, Princes Avenue and Bacon Lane</li> </ul> <p><b>South:</b></p> <ul style="list-style-type: none"> <li>• 17 Former State Cinema/ Mecca Bingo, Kilburn High Road</li> <li>• 27a Asiatic Carpets, High Road, Church End</li> <li>• 27d Church End local centre, High Road, Church End</li> <li>• 33 Mayo Road and St Mary's Open Space, Church End</li> </ul> <p><b>West:</b></p> <ul style="list-style-type: none"> <li>• 1 Atlip Site, Ealing Road, Alperton</li> <li>• 4 Former Guinness Brewery, Park Royal</li> <li>• 5 Careys Site, Acton Lane, Park Royal</li> <li>• 9 Vale Farm Leisure Centre</li> <li>• 10 Northwick Park Hospital</li> <li>• 36 Abbey Estate, Beresford Avenue</li> <li>• 43 Abbey Manufacturing Estate, Woodside Close, Alperton</li> <li>• 44 Sunleigh Road, Alperton</li> <li>• 46 Carlyon Road, Ealing Road, Alperton</li> </ul> <p><i>Note: Based on information from proformas filled in by LBB's officers</i></p>	<p><b>Recommended changes:</b> <u>include mention of requirements to undertake a Flood Risk Assessment in the description of the preferred use of relevant allocated sites, where this is not currently included. Where planning briefs are proposed, these could include details of these requirements</u> – see tables 5, 6 and 7 for site by site comments.</p>
<p><b>Sites that affect listed buildings or are within a Conservation Area</b></p>	<p>The following sites contain or are adjacent to <b>listed buildings</b>:</p> <p><b>North:</b></p> <ul style="list-style-type: none"> <li>• 12 Brent Town Hall</li> <li>• 42 Kingsbury Library and Community Centre</li> <li>• 63 Old St Andrews Church</li> <li>• 87 Kingsbury High School</li> </ul> <p><b>South:</b></p> <ul style="list-style-type: none"> <li>• 16 Kilburn Square, Kilburn High Road</li> <li>• 17 Former State Cinema/ Mecca Building</li> </ul> <p>Note: the above information was obtained from the proformas filled in by LBB's officers.</p> <p>The following sites are adjacent to a <b>Conservation Area</b>:</p> <p><b>North:</b></p> <ul style="list-style-type: none"> <li>• 11 London Transport Sports Ground</li> <li>• 87 Kingsbury High School</li> </ul> <p><b>South:</b></p> <ul style="list-style-type: none"> <li>• 16 Kilburn Square, Kilburn High Road</li> <li>• 84 Lonsdale Road</li> <li>• 100 Canterbury House, Canterbury Road</li> </ul> <p>The following two sites are within a Conservation Area:</p> <ul style="list-style-type: none"> <li>• 63 Old St Andrews Church (North)</li> <li>• 34 Queens Parade, Walm Lane (<b>South</b>)</li> </ul> <p><i>Note: Based on information from GIS</i></p>	<p>In taking forward proposals for any of the sites within or adjacent to listed buildings or Conservation Areas, it should be done in accordance with the relevant Core Strategy policies and forthcoming DC policies.</p> <p><b>Recommended changes:</b> <u>include mention of requirements to the listed building(s) and/or Conservation Area in the description of the preferred use of relevant allocated sites, where this is not currently included. Where planning briefs are proposed, these could include details of these requirements</u> – see tables 5, 6 and 7 for site by site comments.</p>
<p><b>Sites located within an existing MOL boundary</b></p>	<p>Site 51 Dollis Hill House (<b>North</b>), Gladstone Park is completely within a MOL boundary but only involves the restoration of a fire damaged building within MOL.</p> <p>Two other sites are adjacent to a MOL boundary:</p>	<p>MOL should be protected from inappropriate development, as stated in DC Policy OS1. This policy also includes the criteria under which development will be permitted and also lists appropriate MOL uses.</p>

	<ul style="list-style-type: none"> <li>• 62 655 North Circular Road (<b>North</b>)</li> <li>• 10 Northwick Park Hospital (<b>West</b>)</li> </ul> <p><i>Note: Based on GIS information</i></p>	<p><b>Recommended changes: <u>None</u></b></p>
<p><b>Sites within Air Quality Management Areas (AQMA)</b></p>	<p>A large number of the site allocations are within an AQMA, which indicates that air pollution is an issue for those sites.</p> <p>The south of the Borough (and all the allocations in <b>South</b> Planning Area) is completely covered by an AQMA, additionally most of the sites (or part of these sites) in the <b>North</b> and <b>West</b> Planning Areas are also within an AQMA.</p> <p>See Figure 7 to identify which sites are within or outside the AQMA.</p> <p><i>Note: Based on GIS information</i></p>	<p>The draft DC Policy ENV 1 on Air Quality requires that a formal assessment of the effects upon air quality will be required when a major development is located within an Air Quality Management Area (AQMA). It states that the potential impact of proposed developments on air quality will be taken into account when assessing planning applications, and where significant adverse impacts are predicted which cannot be satisfactorily mitigated, development will not be permitted.</p> <p>This will be an important factor in considering the impact of sites allocated within the AQMA as well as in considering the appropriate use and design of the sites. Exposing additional residents to poor air quality could have significant health implications.</p> <p><b>Recommended changes: <u>None on the individual sites, but it would perhaps be beneficial to consider adding a section on environment within section 3 of the draft Preferred Options document (in addition to Open Space). This could include mention of air quality, noise and contaminated land and how these should be generically addressed by sites.</u></b></p>
<p><b>Noise Levels</b></p> <p>(Day time levels relevant to all sites, night time relevant to sites that include residential use)</p>	<p>Noise complaints in Brent have increased since 2002. Between 2002/03 there were 2,198 complaints, in 2003/04 there were 2,647, which rose to 2,925 complaints in 2004/05 and to 3574 in 2005/06<sup>14</sup>. Increasing housing densities is one of the reasons that the 2005-6 AMR cites for the increase: there is a correlation between noise complaints and building density in the Borough.</p> <p>High noise levels, both day and night time is an issue with many sites (see Tables 5, 6 and 7). Increasing development in areas where the noise levels are already high is not only a problem for new residents as it would exacerbate the issue for the existing residents. High noise levels do not only affect residential development but also other uses such as schools and hospitals.</p> <p><i>Note: Based on information from proformas filled in by LBB's officers</i></p>	<p>The draft DC Policy ENV 2 on Noise &amp; Vibration states that noise sensitive development will not be permitted close to existing sources of significant noise. When considering development proposals, the council will take into account the cumulative impact of noise pollution on a locality. Where potential development will result in a significant adverse effect on residents or nearby occupants in terms of noise or vibration generation, it will not be permitted unless acceptable mitigation measures are undertaken. Potentially noise-generating developments should be located away from existing or proposed noise sensitive land uses and noise sensitive development will not be permitted close to existing sources of significant noise.</p> <p>This will be an important factor in considering the appropriate use and design of the sites. Exposing additional residents to existing high levels noise pollution could have significant health and social implications.</p> <p><b>Recommended changes: <u>None on the individual sites, but it would perhaps be beneficial to consider adding a section on environment within section 3 of the draft Preferred Options document (in addition to Open Space). This could include mention of air quality, noise and contaminated land and how these should be generically addressed by sites.</u></b></p>
<p><b>Sites located in greenfield land</b></p>	<p>All sites are on brownfield land except for 11 London Transport Grounds and 9 Vale Farm Sports.</p> <p><i>Note: Based on information from proformas filled in by LBB's officers</i></p>	<p>The use of previously developed land and vacant or underused buildings should be optimised in accordance with CP SS7 Sustainable Communities. The allocated sites appear to respect this policy.</p> <p><b>Recommended changes: <u>None.</u></b></p>

<sup>14</sup> AMR 2005-6



<p><b>Contaminated land</b></p>	<p>A quarter of the land in Brent could be potentially contaminated as a result of historic industrial uses<sup>15</sup>; therefore numerous site allocations are either known or suspected to be contaminated.</p> <p><i>Note: Based on information from proformas filled in by LBB's officers</i></p>	<p>Policy CP ENV2 Protecting the environment includes a reference to 'seeking remediation and re-use of contaminated land' and refers to DC Policy ENV4.</p> <p>Draft policy DC ENV 4 - Contaminated Land states that 'Development on potentially contaminated sites will only be permitted where the extent of contamination is known and mitigation measures and subsequent management measures will render it acceptable for the proposed use. In such circumstances, initially the Council will require a desk top study investigating the nature and extent of any contamination, and subsequently on-site investigations may be required where necessary, prior to the commencement of development, and will be secured by condition'.</p> <p>Possible contamination of sites should be investigated and remediation appropriate to the use of the site should be undertaken. This needs to be dealt with on a site by site basis, if sites are known to be contaminated this could be highlighted in the description of the preferred use for the site.</p> <p><b><u>Recommended changes: None on the individual sites, but it would perhaps be beneficial to consider adding a section on environment within section 3 of the draft Preferred Options document (in addition to Open Space). This could include mention of air quality, noise and contaminated land and how these should be generically addressed by sites.</u></b></p>
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<sup>15</sup> AMR 2005-6, p. 43

**Table 5: SA comments on the preferred sites - North**

11	London Transport Recreation Ground, Forty Avenue	Community (School)	<ol style="list-style-type: none"> <li>1. The development of this site would result in some loss of open space. However, the majority of the open space would be maintained and the site would provide sports and recreation facilities open to the public.</li> <li>2. The north eastern corner is land of borough nature conservation importance.</li> <li>3. The day time level of noise in the vicinity of this site, 50-65 db, which can be higher than the recommended WHO guideline value of 55 db for school playgrounds.</li> </ol>	<ol style="list-style-type: none"> <li>1. No change required, this is sufficiently reflected in preferred use description, see also general comment on Table 4</li> <li>2. The description of the preferred use should also include that development of this site 'must conserve and enhance the spatial interest features' of the nature conservation importance area in accordance with DC policy OS4</li> <li>3. See general comment on noise on Table 4</li> </ol>
12	Brent Town Hall, Forty Lane	Mixed (offices, housing, community)	<ol style="list-style-type: none"> <li>1. The town hall is a grade 2 listed building so any development should have regards to this.</li> <li>2. There are existing traffic and parking issues in the residential areas to the north, west and east.</li> <li>3. There are high maximum noise levels in the vicinity of the site</li> </ol>	<ol style="list-style-type: none"> <li>1. No change required, issue reflected in preferred use description</li> <li>2. No change, the description of the preferred use mentions this issue and asks for any development to seek to improve this.</li> <li>3. See general comment on noise</li> </ol>
19	Dollis Hill Estate, Brook Road	Mixed (school, employment)	<ol style="list-style-type: none"> <li>1. This site has a low PTAL score of between 1 and 2 and the closest bus stop is 300 m away with no stations in the vicinity, and is therefore not very accessible by public transport.</li> <li>2. The site may be contaminated.</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use of the site should include a reference to the need to improve public transport as part of any proposal to develop the site.</li> <li>2. See general comment on contaminated land</li> </ol>
22	Metro House, 1-3 The Mall	Housing	<ol style="list-style-type: none"> <li>1. This site is located in an area of open space deficiency and therefore, opportunities to improve public and private outside space should be sought.</li> <li>2. The site is not in an area that is a priority for regeneration and has a low PTAL score of 2, and therefore the site is not very accessible by public transport.</li> </ol>	<ol style="list-style-type: none"> <li>1. No changes, the description of the preferred use of this site states that 'proposals must include the provision of new amenity space'</li> <li>2. High density housing development is unlikely to be appropriate see also general comment on growth areas. The preferred use of the site includes family housing which would contribute to providing a balanced housing stock, as required by Core Policy H3.</li> </ol>
23	Morrison's, West Moreland Road	Housing/ mixed (housing and retail)	<ol style="list-style-type: none"> <li>1. This site is not in an area that is a priority for regeneration</li> <li>2. This site is located in an area of open space deficiency and the railway line is a wildlife corridor.</li> <li>3. The noise levels in the vicinity of the area are higher than WHO guidelines.</li> </ol>	<ol style="list-style-type: none"> <li>1. See general comment in Table 4</li> <li>2. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7. The description of the preferred use should also include that development of this site 'must conserve and enhance the spatial interest features' of the adjacent Wildlife Corridor in accordance with DC policy OS4</li> <li>3. See general comments on noise (Table 4)</li> </ol>

			4. Part of this site is located in Zone 3 of the floodplain (high risk, 1 in 100 risk of fluvial flooding).	4. The description of the preferred use should state that any proposal should be accompanied by a Flood Risk Assessment, see also general comment on Flood Risk in Table
25	Oriental City, Edware Road	Mixed (housing, retail, food & drink, community and leisure)	<ol style="list-style-type: none"> <li>1. Site located in an area of open space deficiency.</li> <li>2. The nearest station is 600 m away and the site has a low PTAL score of 2, but there are two bus stops within 100 m</li> <li>3. The site has high noise levels</li> <li>4. Site is possibly contaminated.</li> </ol>	<ol style="list-style-type: none"> <li>1. The preferred use should include that proposals for housing development include provision of amenity/ open space development in accordance with DC Policy OS7.</li> <li>2. The description of the preferred use of the site should include improvements to public transport accessibility and a reference to the appropriate density of any housing development given the low PTAL score.</li> <li>3. and 4. See general comments on noise and contamination</li> </ol>
39	Alpine House, Honey Pot Lane	Mixed (housing and affordable workspace)	<ol style="list-style-type: none"> <li>1. The majority of this site is located in an area of open space deficiency and is adjacent to a railway which is a wildlife corridor.</li> <li>2. The site has a low PTAL score of 2.</li> <li>3. Part of this site is located in Zone 3 of the floodplain (high risk, 1 in 100 risk of fluvial flooding).</li> <li>4. The main building may contain asbestos and there may be some ground contamination.</li> <li>5. There are high noise levels in the vicinity of the site</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7. The description of the preferred use should also include that development of this site 'must conserve and enhance the spatial interest features' of the adjacent Wildlife Corridor in accordance with DC policy OS4</li> <li>2. The description of the preferred use of the site mentions family housing which would be more suitable than high density given the low PTAL score.</li> <li>3. The description of the preferred use should include that any proposal for the development of this site should be accompanied by a FRA</li> <li>4. and 5. see general comments on noise and contamination.</li> </ol> <p>Note: The above requirements could be incorporated in the planning brief that the Council is preparing for this site.</p>
42	Kingsbury Library and Community Centre, Stag Lane	Mixed (library and community centre and housing)	<ol style="list-style-type: none"> <li>1. The site has a low PTAL score of 2 and although there is a bus stop within 60 m, the nearest station is over 1 km away.</li> <li>2. The site is adjacent to a conservation area and there are some locally listed buildings.</li> </ol>	<ol style="list-style-type: none"> <li>1. No changes. The description of the preferred use of the site includes provision of a cycling route and a school travel plan for the site.</li> <li>2. A sentence should be included for proposals to have regards to this.</li> </ol>
49	Garages at Barn Hill, Barn Hill Road	Housing	<ol style="list-style-type: none"> <li>1. This site is not located in an area that is a priority for regeneration. The site has a low PTAL score of two and is 300 m to bus stops and over 100 m to the nearest station.</li> </ol>	<ol style="list-style-type: none"> <li>1. Proposals for this site should include improvements to public transport and appropriate density of development given the low PTAL score should be included in the description of the preferred use.</li> </ol>

			<ol style="list-style-type: none"> <li>2. A small part of this site is located in Zone 3 of the floodplain (high risk, 1 in 100 risk of fluvial flooding) and the rest of it is adjacent.</li> <li>3. The site is in the green chain and development would result in the loss of some trees.</li> </ol>	<ol style="list-style-type: none"> <li>2. The preferred use should include that any proposal for the development of this site should be accompanied by a FRA</li> <li>3. No change, the description of the preferred use of the site and the justification for this show that social and environmental improvements to this site, which is currently not being used and attracts fly tipping, etc, should be enough to justify the loss of some trees. The description also requires that any proposal is subject to a full tree and ecological survey.</li> </ol>
51	Dollis Hill House, Gladstone Park	Mixed (food & drink, community, conference and hospital plus car parking)	<ol style="list-style-type: none"> <li>1. The site has a very low PTAL score of 1 and is not well served by public transport.</li> </ol>	<ol style="list-style-type: none"> <li>1. A sentence requiring improvements to accessibility of the site and appropriate density of development given the low PTAL score should be included in the description of the preferred option. Alternatively, this could be incorporated into the planning brief that the Council is preparing for this site.</li> </ol>
53	Gavin/Station House, Neasden Lane	Mixed (residential, retail, food and drink)	<ol style="list-style-type: none"> <li>1. This site is located in an area of open space deficiency</li> <li>2. The site has high noise levels</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7.</li> <li>2. See general comment on noise</li> </ol> <p>Note: Alternatively, these requirements could be incorporated into the planning brief that the Council is preparing for this site.</p>
56	The Lancer PH, Kenton Road	Mixed (residential and retail and/or food and drink)	<ol style="list-style-type: none"> <li>1. This site is not in an area that is a priority for regeneration</li> </ol>	<ol style="list-style-type: none"> <li>1. See general comment on locating housing development on areas that are a priority for regeneration/ growth but no change. This site is well served by public transport and has a high PTAL score.</li> </ol>
57	Sainsbury's Car Park, Draycott Avenue	Residential with some retail car parking	<ol style="list-style-type: none"> <li>1. This site is not in an area that is a priority for regeneration</li> <li>2. The railway line adjacent to this site is a wildlife corridor.</li> </ol>	<ol style="list-style-type: none"> <li>1. As 1 above</li> <li>2. No change, this is already mentioned in the description of preferred use</li> </ol>
58	Prince of Wales PH, Kingsbury Circle	Mixed (housing, retail and/or food and drink)	<ol style="list-style-type: none"> <li>1. This site is located in an area that is not a priority for regeneration</li> <li>2. This site is in an area of open space deficiency</li> <li>3. There are very high noise levels in the vicinity of the site</li> </ol>	<ol style="list-style-type: none"> <li>1. See 1 above</li> <li>2. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7.</li> <li>3. See general comment on noise</li> </ol>
59	Theoco Garage, 3-5 Burnt Oak Broadway, Edgware	Mixed (housing and retail)	<ol style="list-style-type: none"> <li>1. Burnt Oak Station is 530 meters away and the PTAL score is 3, however, there are 2 bus stops within 100 meters walk.</li> <li>2. There may be some contamination</li> <li>3. The noise levels are high.</li> </ol>	<ol style="list-style-type: none"> <li>1. No change, the preferred use already refers to a contribution towards transport improvement.</li> <li>2. and 3. see general comments on noise level and ground contamination</li> </ol>

62	655 North Circular Road	Regeneration of industrial estate	<ol style="list-style-type: none"> <li>1. This site is situated within a SEL but has a very low PTAL score of 1 and poor access that causes congestion along the North Circular.</li> <li>2. The site is also adjacent to the floodplain</li> <li>3. Welsh Harp (north of site) is SSSI, local nature reserve and Grade 1 nature conservation.</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the site already includes 'accessibility improvements', no changes.</li> <li>2. See general comment on flood risk. Although not in the floodplain, this site is 5 hectares and adjacent to the floodplain, so any proposal should be accompanied by a FRA, this should be incorporated to the description of the preferred use.</li> <li>3. This site is adjacent to an SSSI, DC policy OS3 states that '<i>development on or adjacent to SSSIs will only be permitted where it is clearly demonstrated that there will be nil or negligible adverse effects on biodiversity and nature conservation. The Council will consult with English Nature (Natural England) in the determination of any application</i>' the description of the preferred use should require proposals to have regards to this and that development of this site 'must conserve and enhance the spatial interest features' of the areas of Nature Conservation Importance in accordance with DC policy OS4.</li> </ol>
63	Old St Andrew's Church, Old Church Lane	Community facility including place of worship	<ol style="list-style-type: none"> <li>1. The PTAL score is 2.</li> <li>2. The church is a Grade 1 listed building and the site is within a Grade 1 Nature Conservation Area</li> </ol>	<ol style="list-style-type: none"> <li>1. Although the preferred use of the site refers to having regard for the implications of trip generation and car parking, it should also include improvements to public transport, e.g. new bus stop</li> <li>2. The description of the preferred use of the site should include that any proposals have regards for these.</li> </ol>
85	Capitol Way	Mixed (retail/ car showroom with residential above)	<ol style="list-style-type: none"> <li>1. The site has a low PTAL score of 2</li> <li>2. Contamination is possible</li> <li>3. The noise levels can be higher than those recommended by WHO guidelines.</li> </ol>	<ol style="list-style-type: none"> <li>1. No changes, the description of the preferred use for this site includes references to improving/ maintaining cycle routes and pedestrian access.</li> <li>2. and 3. see general comments on noise and contamination.</li> </ol>
87	Kingsbury High School, Princes Avenue and Bacon Lane	Consolidation of High School campuses and recreation/sports	<ol style="list-style-type: none"> <li>1. The site has a low PTAL score of 2 and although there is a bus stop within 60 m, the nearest station is over 1 km away.</li> <li>2. The site is adjacent to a conservation area and there are some locally listed buildings.</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include that proposals include improvements to access to the site and a reference to the appropriate density of development given the low PTAL score of the site</li> <li>2. A sentence should be included for proposals to have regards to this.</li> </ol>
88	12-24 Carlisle Road	Highway widening	<ol style="list-style-type: none"> <li>1. The site may be contaminated</li> </ol>	<ol style="list-style-type: none"> <li>1. See general comment on contamination</li> </ol>
90	Barningham Way	Highway widening	<ol style="list-style-type: none"> <li>1. The site may be contaminated</li> </ol>	As above
91	Oxgate Lane	Link road	<ol style="list-style-type: none"> <li>1. Contamination of the site is likely</li> </ol>	As above
92	Humber Road	Service road	<ol style="list-style-type: none"> <li>1. Contamination of the site is likely</li> </ol>	As above
93	Site Adjoining the	Link road	<ol style="list-style-type: none"> <li>1. Contamination of the site is possible</li> </ol>	As above

	Link, Staples Corner			
104	Sarena House	Mixed (housing and affordable workspace)	<ol style="list-style-type: none"> <li>1. This site is within a growth area but has a low PTAL score of 2 (note: no information in proforma on distance to public transport)</li> <li>2. The site is in an area of open space deficiency</li> <li>3. Contamination of the site is possible</li> <li>4. Day and night time maximum noise levels are high in the vicinity of the site</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include that access by public transport to the site should be improved as part of any development; alternatively any housing development taking place should have a density of dwellings appropriate to the PTAL score of the site.</li> <li>2. The description of the preferred use should include that proposals for the development of this site include provision of open space and or amenity space</li> <li>3. and 4. See general comments on noise and contamination.</li> </ol>
107	1-15 Holmstall Parade	Parking bays and landscaping	<ol style="list-style-type: none"> <li>1. None</li> </ol>	

**Table 6: SA comments on the preferred sites - South**

15	117-119 Malvern Road	Housing	<ol style="list-style-type: none"> <li>1. This site is located in an area of open space deficiency</li> <li>2. Contamination of the site is likely</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7.</li> <li>2. See general comment on contamination</li> </ol>
16	Kilburn Square, Kilburn High Road	Mixed (housing, residential, community and market space)	<ol style="list-style-type: none"> <li>1. This site in an area of open space deficiency</li> <li>2. The site has very high noise levels.</li> <li>3. There is a listed building adjacent to the site.</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7.</li> <li>2. See general comment on noise</li> <li>3. The description of the preferred use of the site could include a reference to this</li> </ol> <p>Note: it is possible that the adopted SPD for this site already covers some of these issues</p>
17	Former State Cinema/ Mecca Bingo, Kilburn High Road	Mixed (community, arts and culture, retail, employment)	<ol style="list-style-type: none"> <li>1. The building is grade 2 listed.</li> <li>2. The site has very high noise levels.</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use of the site makes reference to securing the long-term use of the listed building.</li> <li>2. See general comment on noise</li> </ol>
27a	Asiatic Carpets, High Road, Church End	Mixed (residential, employment)	<ol style="list-style-type: none"> <li>1. The site is in an area of open space deficiency.</li> <li>2. The maximum level of day time and night time noise is higher than WHO guidelines.</li> <li>3. Contamination of the site is possible.</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7.</li> <li>2. See general comment on noise</li> <li>3. See general comment on contamination</li> </ol> <p>Note: some of these requirements could be incorporated into the informal planning brief that the Council is preparing for this site</p>
27b	Ebony Court, High Road, Church End	Residential	<ol style="list-style-type: none"> <li>1. The site is in an area of open space deficiency.</li> <li>2. The maximum level of day time and night time noise is higher than WHO guidelines.</li> <li>3. Contamination of the site is possible.</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7.</li> <li>2. See general comment on noise</li> <li>3. See general comment on contamination</li> </ol> <p>Note: some of these requirements could be incorporated into the informal planning brief that the Council is preparing for this site</p>
27c	White Hart PH, High Road, Church End	Mixed (residential and indoor maket)	<ol style="list-style-type: none"> <li>1. The site is in an area of open space deficiency.</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include provision of amenity/ open space as part of any housing development in</li> </ol>

			<ol style="list-style-type: none"> <li>2. The maximum level of day time and night time noise is higher than WHO guidelines.</li> <li>3. Contamination of the site is possible.</li> </ol>	<p>accordance with DC Policy OS7.</p> <ol style="list-style-type: none"> <li>2. See general comment on noise</li> <li>3. See general comment on contamination</li> </ol> <p>Note: some of these requirements could be incorporated into the informal planning brief that the Council is preparing for this site</p>
27d	Church End local centre, High Road, Church End	Mixed (residential, retail and market space)	<ol style="list-style-type: none"> <li>1. The site is in an area of open space deficiency.</li> <li>2. The maximum level of day time and night time noise is higher than WHO guidelines.</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7.</li> <li>2. See general comment on noise</li> </ol> <p>Note: some of these requirements could be incorporated into the informal planning brief that the Council is preparing for this site</p>
33	Mayo Road and St Mary's Open Space, Church End	Mainly housing subject to public open space	<ol style="list-style-type: none"> <li>1. Part of the site is greenfield land and grade 2 area of Nature Conservation importance. The site is also adjacent to a grade 1 Nature Conservation area.</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include that development of this site 'must conserve and enhance the spatial interest features' of the areas of Nature Conservation Importance in accordance with DC policy OS4.</li> </ol> <p>Note: this requirement could be incorporated into the informal planning brief that the Council is preparing for this site</p>
34	Queens Parade, Walm Lane, Willesden	Mixed (retail and/or food and drink with residential above)	<ol style="list-style-type: none"> <li>1. The site is in an area of open space deficiency.</li> <li>2. The maximum level of day time and night time noise is higher than WHO guidelines</li> <li>3. The site is within a conservation area.</li> </ol>	<ol style="list-style-type: none"> <li>1. No changes, the description of the preferred use includes provision of open space</li> <li>2. See general comment on noise</li> <li>3. The description of the preferred use of the site should make reference to this.</li> </ol> <p>Note: some of these requirements may have been incorporated in the SPD that the Council has prepared for this site.</p>
61	Queens Park Station Area, Salusbury Road	Mixed (residential, community, retail, open space and bus interchange)	<ol style="list-style-type: none"> <li>1. The site is in an area of open space deficiency</li> <li>2. The maximum level of day time and night time noise is higher than WHO guidelines.</li> <li>3. Contamination of the site is possible.</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7.</li> <li>2. See general comment on noise</li> <li>3. See general comment on contamination</li> </ol>



				Note: some of these requirements could be incorporated into the informal planning brief that the Council is preparing for this site
71	Manor Park Road, Acton Lane	Housing	<ol style="list-style-type: none"> <li>1. The site is in an area of open space deficiency.</li> <li>2. The maximum level of day time and night time noise is higher than WHO guidelines.</li> <li>3. Contamination of the site is possible.</li> <li>4. There is also poor access to the site.</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7.</li> <li>2. See general comment on noise</li> <li>3. See general comment on contamination</li> <li>4. The description of the preferred use of the site should include a reference to the need to improve access to the site.</li> </ol>
72	92a Villiers Road, Willesden	Housing	<ol style="list-style-type: none"> <li>1. The site is in an area of open space deficiency.</li> <li>2. Contamination of this site is likely.</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7.</li> <li>2. See general comment on contaminated land</li> </ol>
73	103 Mount Pleasant Road, Brondesbury Park	Housing	<ol style="list-style-type: none"> <li>1. The site is well served by buses but the nearest station is 900 m away and the PTAL score 2.</li> <li>2. The site is in an area of open space deficiency</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use of the site should include a reference to the appropriate density of any housing development given the low PTAL score.</li> <li>2. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7.</li> </ol>
75	Hawthorn Road, Willesden	Housing	<ol style="list-style-type: none"> <li>1. The site has a PTAL score of 3.</li> <li>2. The site is in an area of open space deficiency.</li> <li>3. The maximum level of day time and night time noise is higher than WHO guidelines.</li> <li>4. Contamination of the site is possible.</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use of the site should include improvements to public transport accessibility and a reference to the appropriate density of any housing development given the low PTAL score.</li> <li>2. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7.</li> <li>3. See general comment on noise</li> <li>4. See general comment on contamination</li> </ol>
80	Former Willesden Court House, St Mary's Road	Mixed (community facility with residential above)	<ol style="list-style-type: none"> <li>1. The site is in an area of open space deficiency.</li> <li>2. The maximum level of day time and night time noise is higher</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7.</li> <li>2. See general comment on noise</li> </ol>

			than WHO guidelines.	
82	387-395 Chapter Road	Housing	<ol style="list-style-type: none"> <li>1. This site is not within an area that is a priority for regeneration</li> <li>2. The site is in an area of open space deficiency.</li> <li>3. Contamination of the site is possible.</li> </ol>	<ol style="list-style-type: none"> <li>1. See general comment on Table 4, but no changes, the site has very good access to a local underground station, the description of the preferred use requires proposals to provide foot and cycle routes and improvements to the access to the station.</li> <li>2. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7.</li> <li>3. See general comment on contaminated land</li> </ol>
84	Lonsdale Road, Kilburn	Mixed (retail/ food and drink, residential, affordable/creative workspace and education)	<ol style="list-style-type: none"> <li>1. The site is in an area of open space deficiency.</li> <li>2. Contamination of the site is possible</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7.</li> <li>2. See general comment on contaminated land</li> </ol>
99	Junction of Sidmouth Road and Willesden Lane	Junction widening	None	
100	Canterbury House, Canterbury Road	Mixed (office, community, residential)	<ol style="list-style-type: none"> <li>1. The site is in an area of open space deficiency and adjacent to a railway line that is a wildlife corridor.</li> <li>2. It is also adjacent to a conservation area and Canterbury House is a listed building.</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7. The description of the preferred use should also include that development of this site 'must conserve and enhance the spatial interest features' of the adjacent Wildlife Corridor in accordance with DC policy OS4.</li> <li>2. The description of the preferred use of the site should make reference to these</li> </ol>
103	Land Rear of 12-14 Bridge Road	Housing	<ol style="list-style-type: none"> <li>1. The site has a low PTAL score of 2 and the nearest bus stop and station are located respectively 300 and 1000 m away.</li> <li>2. There is a possibility that the site may be contaminated including with asbestos.</li> </ol>	<ol style="list-style-type: none"> <li>1. The preferred use of the site includes 'access improvement', however, a reference to improving accessibility by public transport and appropriate density of development given the low PTAL score should also be included.</li> <li>2. See general comment on contaminated land</li> </ol>

**Table 7: SA comments on the preferred sites - West**

1	Atlip Site, Ealing Road, Alperton	Mixed (housing, amenity, employment)	<ol style="list-style-type: none"> <li>1. Part of this site is in an area of open space deficiency</li> <li>2. This site is adjacent to a green chain</li> </ol>	<ol style="list-style-type: none"> <li>1. No change, the description of the preferred use includes the provision of amenity space#</li> <li>2. The description of the preferred use should include that the green chain is '<i>protected and enhanced</i>' and that any proposal for development on or adjacent to it should meet the criteria listed in Policy DC OS2.</li> </ol>
3	Twyford Tip, Abbey Road, Park Royal	Mixed (waste facility, energy generation and employment)	<ol style="list-style-type: none"> <li>1. This site is currently mostly vacant and contaminated.</li> <li>2. It is also adjacent to the Great Union Canal which is a Grade 1 Site of Nature Importance and Green Chain.</li> <li>3. Part of this site is located in Zone 3 of the floodplain (high risk, 1 in 100 risk of fluvial flooding).</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use of this site makes reference to remediation of the site</li> <li>2. The description of the preferred use should include that development of this site 'must conserve and enhance the spatial interest features' of the adjacent Grade 1 Site of Nature Importance in accordance with DC policy OS4. See also comment about Green Chain in number 2 above.</li> <li>3. The description of the preferred use should include that any proposal for the development of this site should be accompanied by a FRA</li> </ol>
4	Former Guinness Brewery, Park Royal	Mainly employment but health/ and or education and some residential acceptable	<ol style="list-style-type: none"> <li>1. The site has a low PTAL score of 2, with the closest bus stop more than 300 m away and no stations in its proximity.</li> <li>2. This site is adjacent to a green chain</li> <li>3. Contamination is likely.</li> </ol> <p>Note: no information about noise levels</p>	<ol style="list-style-type: none"> <li>1. The description of the preferred use of the site includes references to various improvements to accessibility to the site</li> <li>2. The description of the preferred use should include that the green chain is '<i>protected and enhanced</i>' and that any proposal for development on or adjacent to it should meet the criteria listed in Policy DC OS2.</li> <li>3. See general comment on land contamination</li> </ol> <p>Note: it is possible that some of these issues have already been addressed in the existing SPD for this site</p>
5	Careys Site, Acton Lane, Park Royal	Mainly employment and hospital expansion, with key worker housing for hospital workers	<ol style="list-style-type: none"> <li>1. This site has a low PTAL score of 2</li> <li>2. Contamination is possible</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use for this site includes bus lane improvements.</li> <li>2. See general comment on contaminated land</li> </ol>
7	Former Unisys Site, North Circular Road	Mixed (employment, sport and recreation, community, housing)	<ol style="list-style-type: none"> <li>1. The site is within Zone 3 of the floodplain (high risk, 1 in 100 risk of fluvial flooding).</li> <li>2. Part of the site is likely to be contaminated.</li> <li>3. Levels of noise are high due to proximity to North Circular.</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include that any proposal for the development of this site should be accompanied by a FRA</li> <li>2. See general comments on contamination</li> <li>3. The description of the preferred use of the site states that no residential development will be permitted within 30 m of the central section of the North Circular and any residential development will require mitigation for noise pollution</li> </ol> <p>Note: The Council is preparing an informal planning brief for this site which could</p>

				include some of this issues/ requirements.
9	Vale Farm Leisure Centre	Indoor and outdoor sports and recreation	<ol style="list-style-type: none"> <li>1. Part of the site is greenfield and development would possibly result in loss of open space.</li> <li>2. The site has a low PTAL score of 1</li> </ol>	<ol style="list-style-type: none"> <li>1. No change, loss of open space would result in improved sports and recreational facilities and this is in accordance with DC Policy OS6</li> <li>2. The description of the preferred use of the site should include a reference to improving access by public transport to the site as part of any development</li> </ol>
10	Northwick Park Hospital	Hospital with ancillary retail and leisure and key worker housing for hospital workers	<ol style="list-style-type: none"> <li>1. This site is adjacent to a Grade 1 Borough Nature Conservation site and MOL.</li> <li>2. Noise levels are higher than recommended by the WHO for hospitals</li> <li>3. Contamination is possible.</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include that development of this site 'must conserve and enhance the spatial interest features' of the adjacent Grade 1 Borough Nature Conservation site in accordance with DC policy OS4.</li> <li>2. and 3. see general comments on noise and contamination</li> </ol>
28	Wembley West End, Wembley High Road	Mixed (retail, residential and car park)	<ol style="list-style-type: none"> <li>1. The majority of this site is an area of open space deficiency.</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7.</li> </ol> <p>Note: there is an adopted SPD for this site which may include reference to this issue</p>
32	Northfields Industrial Estate	Mixed (employment and residential)	<ol style="list-style-type: none"> <li>1. The site has a low PTAL score of 2</li> <li>2. This site is in an area of open space deficiency</li> <li>3. The site is adjacent to Grand Union Canal and the River Brent- site of Metropolitan Nature Conservation Importance and site of Local Nature Conservation Importance Respectively</li> <li>4. Part of this site is located in Zone 3 of the floodplain (high risk, 1 in 100 risk of fluvial flooding).</li> <li>5. Contamination is possible</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use of the site includes improvement to road and pedestrian access but it should also include improvements to public transport accessibility and a reference to the appropriate density of any housing development given the low PTAL score.</li> <li>2. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7.</li> <li>3. The description of the preferred use should include that development of this site 'must conserve and enhance the spatial interest features' of the adjacent sites of nature conservation importance in accordance with DC policy OS4.</li> <li>4. The description of the preferred use should include that any proposal for the development of this site should be accompanied by a FRA</li> <li>5. See general comment on contaminated land</li> </ol> <p>Note: The Council is contributing to the Park Royal Opportunity Area Planning Framework (OAPF) which may cover some of this requirements, in particular those relevant to transport improvements</p>

36	Abbey Estate, Beresford Avenue	Mixed (work/live, affordable workspace and residential)	<ol style="list-style-type: none"> <li>1. The site is in an area of open space deficiency</li> <li>2. The site is adjacent to a green chain</li> <li>3. It has a very low PTAL score of 1, with the nearest bus stop 200 m away and the nearest station 600 m.</li> <li>4. Contamination of the site is likely.</li> <li>5. Noise levels are high in the vicinity of the site</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7.</li> <li>2. The description of the preferred use should include that the green chain is '<i>protected and enhanced</i>' and that any proposal for development on or adjacent to it should meet the criteria listed in Policy DC OS2.</li> <li>3. The description of the preferred use of the site should include improvements to public transport accessibility and a reference to the appropriate density of any housing development given the low PTAL score.</li> <li>4. See general comments on contamination and noise</li> </ol> <p>Note: The above requirements could be incorporated in the planning brief that the Council is preparing for this site.</p>
37	Dirkan Site, North End Road, Wembley	Mixed (residential and workspace)	<ol style="list-style-type: none"> <li>1. This site is located within Zone 3 of the flood plain</li> <li>2. The site is adjacent to Borough Nature Conservation Importance &amp; Site of Local Nature Conservation.</li> <li>3. Contamination of the site is likely.</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include that any proposal for the development of this site should be accompanied by a FRA</li> <li>2. The description of the preferred use should include that development of this site 'must conserve and enhance the spatial interest features' of the adjacent sites of nature conservation importance in accordance with DC policy OS4.</li> <li>3. See general comment on contaminated land</li> </ol> <p>Note: The above requirements could be incorporated in the planning brief that the Council may prepare for this site.</p>
43	Abbey Manufacturing Estate, Woodside Close, Alperton	Mixed (residential, amenity and workspace)	<ol style="list-style-type: none"> <li>1. The site has a low PTAL score, 2, and the nearest bus stop is 250 m away.</li> <li>2. This site is in an area of open space deficiency</li> <li>3. Contamination is possible.</li> <li>4. The site is adjacent to Grand Union Canal a site of Metropolitan Nature Conservation Importance and subject to Grand Union Canal Policy.</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use of the site includes a reference to improving road access to the site, however, it should also include improvements to public transport accessibility and a reference to the appropriate density of any housing development given the low PTAL score.</li> <li>2. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7.</li> <li>3. See general comment on contaminated land</li> <li>4. The description of the preferred use should include that development of this site 'must conserve and enhance the spatial interest features' of the adjacent Grand Union Canal in accordance with DC policy OS4.</li> </ol> <p>Note: The above requirements could be incorporated in the planning brief that the Council is preparing for this site.</p>
44	Sunleigh Road,	Mainly housing	<ol style="list-style-type: none"> <li>1. This site is in an area of open space deficiency.</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include provision of amenity/</li> </ol>

	Alperton		<ol style="list-style-type: none"> <li>2. The site is adjacent to a green chain</li> <li>3. The site has a low PTAL score of 2 and the nearest bus and train station are 450 m away.</li> <li>4. The site is potentially contaminated.</li> </ol>	<p>open space as part of any housing development in accordance with DC Policy OS7.</p> <ol style="list-style-type: none"> <li>2. The description of the preferred use should include that the green chain is '<i>protected and enhanced</i>' and that any proposal for development on or adjacent to it should meet the criteria listed in Policy DC OS2.</li> <li>3. The description of the preferred use of the site should include improvements to public transport accessibility and a reference to the appropriate density of any housing development given the low PTAL score.</li> <li>4. See general comment on contamination</li> </ol> <p>Note: The above requirements could be incorporated in the planning brief that the Council is preparing for this site.</p>
46	Carlyon Road, Ealing Road, Alperton	Mixed (residential, amenity, employment)	<ol style="list-style-type: none"> <li>1. The site has a low PTAL score of 2 and the nearest bus stop and station are 450 m away</li> <li>2. The North edge of the site borders the Grand Union Canal which is part of a Green Chain and subject to Grand Union Canal Policy.</li> <li>3. The site has high noise levels particularly at night time.</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use includes improving access for pedestrians and canal user but it should also include that access by public transport to the site should be improved as part of any development; alternatively any housing development taking place should have a density of dwellings appropriate to the PTAL score of the site.</li> <li>2. The description of the preferred use should include that development of this site 'must conserve and enhance the spatial interest features' of the adjacent Grand Union Canal in accordance with DC policy OS4</li> <li>3. See general comment on noise</li> </ol> <p>Note: The above requirements could be incorporated in the planning brief that the Council is preparing for this site.</p>
83	Land Adjoining St Johns Church, 614 High Road	Mixed (residential and community facility)	<ol style="list-style-type: none"> <li>1. The site is not in an area that is a priority for regeneration.</li> <li>2. The site is in an area of open space deficiency.</li> <li>3. St John's Church is a listed building.</li> <li>4. The site has high noise levels particularly at night.</li> </ol>	<ol style="list-style-type: none"> <li>1. See general comment on residential development in areas that are not a priority for regeneration.</li> <li>2. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7.</li> <li>3. No change, the description of the preferred use makes sufficient reference to this</li> <li>4. See general comment on noise</li> </ol>
97	Footbridge at Waxlow Road	Footbridge	<ol style="list-style-type: none"> <li>1. Adjacent to the Canal which is a wildlife corridor</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include that development of this site 'must conserve and enhance the spatial interest features' of the adjacent Wildlife Corridor in accordance with DC policy OS4.</li> </ol>

			2. Contamination is possible	2. See general comment on contamination
98	South Way	Continuation and completion of Stadium Access Corridor	1. Contamination is possible	See general comment on contamination
101	Shubette House/Karma House/Apex House/Olympic Way	Mixed (residential, hotel, office, workspace, leisure, food and drink)	<ol style="list-style-type: none"> <li>1. This site is in an area of open space deficiency</li> <li>2. Part of this site is within Zone 3 of the floodplain</li> <li>3. Contamination of the site is possible</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7.</li> <li>2. The description of the preferred use should include that any proposal for the development of this site should be accompanied by a FRA</li> <li>3. See general comment on contamination</li> </ol> <p>Note: The above requirements could be incorporated in the planning brief that the Council is preparing for this site.</p>
102	Kelaty House/Wembley Stadium Industrial Estate	Mixed (employment-led including leisure, offices and residential)	<ol style="list-style-type: none"> <li>1. This site is in an area of open space deficiency</li> <li>2. Part of the site have a PTAL score of 1-2 and a small part has a score of 3</li> <li>3. Contamination of this site is likely</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7.</li> <li>2. The description of the preferred use of the site includes public transport accessibility improvements as required for any proposal for the site</li> <li>3. See general comment on contamination</li> </ol> <p>Note: The above requirements could be incorporated in the planning brief that the Council is preparing for this site.</p>
105	Brook Avenue	Housing	<ol style="list-style-type: none"> <li>1. The site is in an area of open space deficiency</li> <li>2. Part of this site is in Zone 3 of the floodplain</li> <li>3. The northern corner of the site is within a conservation area.</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include provision of amenity/ open space as part of any housing development in accordance with DC Policy OS7.</li> <li>2. The description of the preferred use should include that any proposal for the development of this site should be accompanied by a FRA</li> <li>3. The description of the preferred use of the site should include a reference to this</li> </ol>
106	Minavil House and Unit 7 Rosemont Road	Mixed (affordable office and workspace and residential)	<ol style="list-style-type: none"> <li>1. The site is adjacent to a green chain</li> <li>2. High noise levels in the vicinity of the site</li> <li>3. Contamination is possible</li> </ol>	<ol style="list-style-type: none"> <li>1. The description of the preferred use should include that the green chain is '<i>protected and enhanced</i>' and that any proposal for development on or adjacent to it should meet the criteria listed in Policy DC OS2.</li> <li>2. and 3. See general comments on noise and contamination</li> </ol>

## Appendix 1: Summaries from the SA of Policies in the Core Strategy Preferred Options

The summaries policies in the Spatial Strategy are:

- CP SS1: Key Principles for Development
- CP SS2: Population and Housing Growth
- CP SS3: Focus of Growth
- CP SS4: Commercial Regeneration

### Effects:

By the nature of the policy, which sets out principles which underpin the spatial strategy, it is relatively strategic and therefore its impacts will be dependant on detailed implementation through other policies in the Core Strategy as well as in subsequent DPDs (e.g. development control policies) and SPDs.

Generally the Key Principles for Development score positively against the sustainability criteria. The emphasis on prioritising public transport, walking and cycling and improving transport nodes is particularly positive and could help the achievement of broader sustainability goals (environmental, social, as well as economic). The focus on regeneration and improving town centres etc is also very positive in terms of achieving social equity and improving quality of life for the most deprived residents. Focussed growth in a limited number of well connected and serviced areas is also positive from a sustainability perspective.

Environment, as well as social and economic, benefits should be derived from the emphasis on, for example, high quality design, a design-led approach and mitigating and adapting to climate change.

The focus on mixed use development and affordable homes could be seen by some developers as having a negative impact on the viability of some sites. However, with flexibility and uses tailored to specific locations this is not considered to outweigh the benefits, which include: sustaining a critical mass of uses and activities; reducing car dependency through allowing people to be near to a range of shops, amenities and jobs; ensuring a wider range of participation in urban life and avoid polarisation of social groups by mixing of different housing types and tenures; creating jobs for local communities; increasing workforce productivity by providing nearby leisure and retail opportunities etc.

### Mitigation / Enhancement:

As this policy sets out the principles of the spatial strategy, the effects will be dependant on the implementation via the other policies in the Core Strategy, as well as other DPDs and SPDs. Various references are included within the comments above to where the forthcoming development control policies will need to focus to ensure the positive effects are enhanced and the negative effects are minimised (see comments on individual objectives).

More specific comments include:

- 2<sup>nd</sup> bullet point – amend “to ensure growth is sustainable” to “to ensure growth is as sustainable as possible”.
- 7<sup>th</sup> bullet point – amend “all development should be sustainable” to “all development should contribute towards achieving sustainable development”.

These changes as proposed because development is always likely to be a compromise between the different dimensions of sustainability and delivering sustainable development is an aspirational concept.

### Effects:

This policy (and supporting text) generally scores very positively against social and economic criteria, but has potentially significantly negative environmental impacts. This is due to the implications of construction, population increase and the associate consumption of materials, travel needs, waste, water and energy requirements / creation this implies. This is likely to be the case regardless of mitigation through other policies, although the scale of the effects could be reduced. It is welcomed that this factor is recognised in the supporting text.

The level of provision of additional homes is dictated by the London Plan and therefore the opportunity to avoid some negative effects, particularly some of the environmental effects, are not open to the Borough. Therefore the only option available is to try to mitigate these negative effects are far as possible.

Positive scores on social objectives are dependant on regeneration impacts being suitable and accessible to local people.

### Mitigation / Enhancement:

The main mitigation and enhancement will be provided by the other policies in the Core Strategy which seek to minimise environmental effects of development and provide the infrastructure necessary to support it, as well as policies / guidance in other forthcoming DPDs and SPDs.

Some minor additions and alterations are proposed within the comments above to the supporting text to, in particular, enhance the positive effects (see comments on individual objectives).

The phasing of the proposed development will be critical to both manage negative effects during construction, including the cumulative



effects such as noise and dust on local people of several sites within a small area, and ensure that the infrastructure necessary is in place at the appropriate time. This is dealt with by several other policies in the Core Strategy, including SS6.

**Effects:**

Focussing growth in areas of good accessibility and in need of regeneration is beneficial in terms of sustainability and the policy generally scores positively as a result. However potential negative environmental effects due to the scale of growth noted under SS2 may concentrate negative impacts in the areas of focussed growth / development – noise, air and water pollution etc may be exacerbated at the local level, for example. The need for development to be directly linked to improvements in infrastructure, as required by the policy, is a key condition on further development. If adequate infrastructure is not provided in time for the increase in population the policy would have more significant negative effects.

It is also important that development at local level, particularly in areas currently relatively deprived, does not lead to new housing / opportunities unsuitable for existing residents – which may in long term increase current disparities rather than ease them.

**Mitigation / Enhancement:**

Focussing growth in a limited number of centres is generally a positive approach from a sustainability perspective. However it is very important that the possible localised negative environmental impacts are addressed through implementing other policies in the Core Strategy (including SS1, SS9, SD2, ENV1 and ENV2) and will need to be dealt with in more detail in the forthcoming development control policies.

The phasing of infrastructure improvements will be important to avoid negative effects, which is included in SS6.

Involving the local community and key stakeholders in planning for the regeneration of the growth areas will also be important, as highlighted in the supporting text.

**Overall Summary**

**Effects:**

Overall this policy scores very positively, particularly against economic objectives. The emphasis given in the supporting text to supporting local needs and use of S106 agreements to provide training for local people is welcomed from a sustainability perspective.

There are some negative scores against environmental objectives, which relate primarily to the generation of traffic (either through general increase in business activity, or the proposed encouragement of distribution business) and the reliance on road transport.

**Mitigation / Enhancement:**

Although it is recognised that storage and distribution is predicted to be a growth industry nationally, and for the Borough, and protecting industrial land restricts opportunities for high value uses particularly residential development, we would caution against it being encouraged as a focal industry for Brent. Distribution is likely to create disproportionately less employment relative to the land take of buildings, as well as generate traffic and associated noise and pollution. They may increase local GVA, but lead to limited benefit for local residents.

The possible negative environmental impacts of development for business and industry are addressed explicitly through other policies in the Core Strategy (including SS1, SS9, SD2, ENV1 and ENV2) and will need to be dealt with in more detail in the forthcoming development control policies.

The phasing of infrastructure improvements will be important to avoid negative effects, which is included in SS6.